Shropshire Council: Shropshire Local Plan

Representation Form

*Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s).***

*We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.*

Part B: Representation

Name and Organisation:	M. W. Parrish, The Planning Group Ltd

Q1. To which document does this representation relate?

☑ Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

☑ Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

☐ Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:		Policy:	S18.2	Site:	Land North of Tudor House, Prees	Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	☐	☑
B. Sound	☐	☑
C. Compliant with the Duty to Co-operate	☐	☐

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached representations. The allocation of site PPW025, Land North of Tudor House, Prees is unsound, and there is a more sustinable alternative site, PPW021a, that should be allocated instead.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representations. Site PPW021a is more sustainable as demonstrated in the Sustainability Appraisal, and should be allocated instead of site PPW025 which has not been demonstrated to be deliverable, and which is less sustainable than site PPW021a

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

☐ No, I do not wish to participate in hearing session(s)

☑ Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

We are the agents on behalf of the landowners of site PPW021a, and wish to attend to participate in discussion on the preferred allocation at Prees, and to make representations as to the better and more sustainable alternative

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Date: 26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

SHROPSHIRE COUNCIL
REGULATION 19 CONSULTATION

REPRESENTATIONS ON BEHALF OF MR J THORPE IN RESPECT OF LAND EAST OF LIGHTEACH ROAD, PREES (PPW021a)

Introduction and chronology

1. These representations are submitted on behalf of Mr J Thorpe who owns land east of Lighteach Road, Prees ref PPW021a ("the site"). The site is not a preferred option in the emerging plan. The preferred option is PPW025, Land North of Tudor House, Prees. These submissions and supporting information demonstrate that the preferred site has not been justified. Accordingly, we object to the allocation contained within Schedule S18.2(i) and submit that site PPW021a should be allocated instead.

2. Site PPW021a is a superior option for the future growth of Prees which is deliverable, sustainable and can provide significant market and affordable housing. The site can deliver circa 60 units and indicative layouts are shown at Appendix G and J.

3. The site falls within the Prees Community Hub in the Whitchurch Place Plan Area.

4. Throughout the course of the Shropshire Local Plan Review, both our client Mr J Thorpe, who is the landowner, and ourselves have sought to have discussions with the Council's representatives to discuss the merits of the site, particularly by comparison of the site, PPW025.

5. Despite assurances that a meeting would be arranged from very senior members of the Council over a 2-year period of time, a meeting was finally arranged following a phone call from Mr Eddie West, The Interim Planning Policy and Strategy Manager, on 9 November 2020, to schedule a Microsoft Teams meeting on 12 November 2020.

6. Prior to that meeting, documentation had been sent to the Council initially through the "Preferred Sites" consultation period of 28th November 2018 and 31st January 2019, and this documentation was sent again on 9 May 2019, including a proposed agenda and agenda notes, which was forwarded to Eddie West. We also sent a hard copy of the very comprehensive Regulation 18 Consultation Response (Appendix D) which was delivered by registered post on 22 September 2020.

7. Following the meeting of 12th November 2020, a further email with evidence relating to an indicative site layout, Flood Risk Assessment and Access Statement was sent to Eddie West The Interim Planning Policy and Strategy Manager, as he could not recall seeing them previously.

8. Further documentation including a Potential Phasing Plan (Appendix J) was sent to Eddie West, together with a detailed response comparing the proposed site to the preferred site PPW025, which demonstrated that the site was more sustainable and deliverable than the proposed allocation.

9. All the relevant documentation referred to above are attached as background information. (Appendices A-O, listed on page 7)

Notwithstanding the above chronology: -

(i) It would appear from the Teams Meeting on 12 November 2020, that whilst information was requested and subsequently sent on 29 November 2020, it was apparent that the report to Cabinet had been prepared for 7 December 2020, with the relevant S18 Unilateral Place Plan Area Inset Maps indicating the preferred option as PPW025. It is apparent that the decision on the preferred option had already been made and our later submissions, post the Teams Meeting, was not considered.

10. We do not consider that the site has been properly or fairly assessed as part of the site assessment process. Questions that we consider remain unanswered are as follows: -

(i) When was site PPW021a visited and a thorough assessment undertaken having regard to all the detailed information submitted?

(ii) The documentation submitted in respect of the site was not simply a red line around an area of land but a carefully considered method of developing the site to benefit the village as a whole, including detailed drainage and access reports. How has this been taken into account?

(iii) Did the Council consult with their own Drainage Consultants and the Environment Agency to assess drainage and flooding issues?

(iv) What benefits are achieved through developing PPW025 that would outweigh the benefits as set out in PPW021a? The policy, in respect of the preferred allocation, reveals that there are significant issues to still be resolved that that have not yet been dealt with. These are as fundamental as access to this site, management of flood risk and acoustic mitigation to

appropriately manage noise from the road. There is no evidence such issues can be overcome, and a suitable design implemented.

(v) It is clear that whilst part of that site (PPW025) floods there is no reference to whether the development will help to address the existing flood issues in the near vicinity of the site.

(vi) Unfortunately, due to being unable to see any proposed layout for PPW025, no comments on such can be made.

(vii) What consideration was given to the large-scale opportunities that the site PPW021a provides in providing a substantial area of open space, not only for new residents, but also for the remainder of the village with a footpath network, a small village green and balancing ponds to help address flooding issues. As can be seen from Appendix A, recreational open space is severely lacking in Prees.

(viii) Clearly, having regard to the layout (as documented in the conclusion of the FRA), no part of any residential unit or its garden would be subject to flooding and any play equipment/area would be available in times of flooding.

(ix) It is proposed to provide a shop on site PPW021a. The provision of an additional shop would provide additional facilities for existing and proposed residents on the western side of the village. This is a sustainability benefit that has not been proposed and could not be achieved on the preferred allocation PPW025.

(x) The layout of the site would be spacious, enabling a substantial housing mix providing a variety to the village's housing stock coupled with a substantial landscaping scheme.

(xi) Due to ground contours, the development of PPW025 would appear to increase water run offs into the existing brook without any form of alleviation to prevent the existing flooding being exacerbated, whereas development of PPW021a will actively look to address such issues. Again, Appendix A shows that local experience is that the proposed allocation floods.

(xii) The proposed allocation is close to the Conservation Area and several listed buildings and it is unclear how its impact on the historic environment is to be mitigated. This point was recognised in the 2018 SLAA, but it is not clear how the issue has been resolved. Given the duties on the LPA pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990, and part 16 of the NPPF, this matter must be resolved through detailed assessment

before the site can be allocated as it may well represent a "showstopper". Requiring the assessment through the policy at page 300 of the Pre-Submission Draft is unacceptable.

11. The Government is actively encouraging better design and style of homes throughout the country and the development of the site offers the opportunity for a development which encourages and incorporates the opportunity to develop this rural site to respect its surrounding environment whilst providing high quality housing in a pleasant spacious environment.

12. It is considered that the Council have at a very early stage in the Plan process, identified a site as a preferred option and have failed to justify why alternative sites, particularly the site we are promoting, are unacceptable and there is doubt whether they have received due consideration as part of the process.

13. Without intricate knowledge of all sites throughout Shropshire, we are unable to assess whether all requests for consideration have been treated in a consistent manner and whether the Council have undertaken consultations with all relevant bodies to seek their comments. By way of example, we know that the Council only met with the Parish Council to discuss the procedure for selection of a preferred option, but never discussed any individual sites. This was confirmed to Mr J Thorpe by Mr Hirons, Chairman of the Prees Parish Council during discussions in 2019.

14. In documentation previously submitted, it has been clearly demonstrated that the preferred site (PPW025) was previously opposed in 2014 by the Parish Council as being unacceptable for the following reasons: Appendix "A".

15. In the SLAA 2018, Appendix "B" assessment summary site PPW025 was assessed as not being currently suitable but may have further potential which is the same as PPW021a. On the face of that document, there is no basis to prefer the proposed allocation. However, the Regulation 18 SA makes it clear that the site (PPW021a) scored higher, achieving "good" in the overall assessment, when compared to the proposed allocation which scored only "fair". The Council's own evidence base regards the site as more sustainable than the proposed allocation – Appendix "O".

16. Supporting Case

17. There is significant potential for development of the site PPW021a to meet the three overarching objectives for sustainable development as set out in Section 2 of the NPPF.

18. Economic objective – The site is located immediately adjacent to existing residential development and its proposed access will be directly onto the road in a central location in the village. The Railway station is close by and makes for easy access for commuters.

19. It offers an exciting opportunity for a proposal that will provide a sustainable development which will incorporate a high level of design with ample land to allow a spacious layout providing benefits to all village residents as well as new home owners. It is intended to provide a retail unit for convenience shopping to serve the immediate area with easy access and limited parking for customers using vehicles.

20. Whilst layout plans have been submitted, these are indicative only and incorporate phasing of the development.

21. Social Objective – It is intended to provide a mix of housing within the site incorporating two storey and single storey properties of various sizes including both open market and affordable units.

22. The development will reflect the aims of the NPPF plus more recent and ongoing Government advice to provide high quality design for the benefit of residents both in the short term and long-term future.

23. The location of the site and its existing features allow for substantial open space, again for proposed residents and existing villagers, which will meet the community health, social and cultural wellbeing aims of the NPPF.

24. Environmental Objective – The proposal will make effective use of the land that is viewed as part of the existing village but has no public access to it.

25. By the very nature of the proposed layout, it is intended to provide public open space, an open central area for community use, public footpaths along the brook through the site which will provide such facilities that are currently lacking within the village.

26. There are substantial formal football and cricket pitches but walking of dogs, cycling and general informal exercise opportunities are limited within the village, the development of the site will provide and encourage such activities.

27. Furthermore, the proposal includes the provision of balancing ponds that will be provided to help ease the existing flooding situation both by the access to the site and under the bridge and it is intended to work closely with the Environment Agency to finalise the works that would be supported.

Accordingly, the flood risk on site will be mitigated and a betterment provided elsewhere.

28. In respect of access to the site, there is an option to achieve access from two places (Appendix I); one access point is not in the flood zone at all. The other is but can be mitigated by ground raising; see the Flood Risk Assessment at Appendix H.

29. Substantial landscaping will be undertaken throughout, and around, the periphery of the site that will encourage wildlife in the area.

30. For the avoidance of doubt, whilst work will need to be undertaken to provide safe access to the site, no dwellings or their associated garden areas will be in an area which may flood. It should be noted that the proposed allocation is also located within flood zone 3.

31. Having regard to the current open nature of the site, the finalised layout including phasing, will mean that any development can be flexible and able to adapt to rapid changes and at the same time can provide for all appropriate requirements for distribution of development.

32. With regard to Section 3 of the NPPF, this states that plans should be prepared with the objective of contributing to the achievement of sustainable development with criteria (b) adding should be prepared positively, in a way that is aspirational but deliverable.

33. This objective is considered particularly relevant as the site would provide a development of a high standard with benefits to the village that other sites cannot provide due to restrictions on size or siting.

34. The strategic position of the site and the benefits it will provide have been set out in the previous text relating to Section 2 as regards the mix of housing, employment in the form of the retail unit plus the development of the site, biodiversity, walkways, cycle ways and flood mitigation measures, generally for the benefit of all villagers.

35. All criteria (a) to (d) of paragraph 20 of the NPPF will be provided for within the development.

36. In Section 4 Decision Making; the NPPF, clearly states that Local Planning Authorities should approach decisions in a positive and creative way and work proactively with applicants.

37. It is fully appreciated that this Section refers to the consideration of applications rather than the Local Plan Review. Nevertheless, the Council has constantly until November 2020, refused to enter into discussions regarding the potential benefits of the development of this site and its consideration under the Local Plan Review process.

38. Throughout the Local Plan Review, we have submitted substantial documentation to support the case for inclusion as a preferred option in the call for sites.

39. The submitted information related to sites registered as PPW021a, 021b and 021c but site PPW021a is the most relevant for consideration having regard to the details supplied.

40. Accordingly, the following attachments are provided to demonstrate the information submitted for consideration: -

41. Attachments

42. For some inexplicable reason all reference to site PPW021a is omitted from the documentation contained within attachment M.

43. This matter should be addressed now as it clearly does not represent an accurate assessment of the site and potentially there may be others that have been missed.

44. The reference to the site being backland creates an entirely false impression of the site and the accompanying Access Statement clearly shows the site has its own road frontage.

45. If this sort of arrangement is used as criteria for backland development and hence is resisted as such, then very little development would be supported throughout the country and hence such interpretation would be totally against the principles and aims of the NPPF.

A Letter of objection from Prees Council to application No 14/03511/OUT which is now the preferred option site PPW025.

B Letter in connection with above application to applicant from Environment Agency.

C Email to Mark Barrow dated 29.8.2020 and response dated 11.9.2020.

D Letter to SC Regulation 18 Consultation.

E Letter from Shingler Group confirming site can be delivered in two phases. Phase 1 in years 1-5 and Phase 2 years 6-10 with 20% affordable and one retail unit.

F Further letter to SC following meeting dated 16/11/20202.

G Indicative Site layout.

H Flood Risk Assessment

I Access Assessment

J Indicative layout plan showing phasing

K Letter to SC dated 17.9.2020 comparing site to PPW025.

L Alternative indicative layout that showed secondary access onto Lighteach Road, but main discussions have related to single access.

M Sustainability report appendices preferred site (PPW025). Page152 no reference is made regards the sustainability of PPW021a which is an inexcusable omission by the LPA. **Taken from Sustainability Appraisal supporting Regulation 19 pre-submission draft.**

N Site assessments Whitchurch Area page 187 and onward.

O Sustainability appraisals page 189 for comparison to PPW025, note PPW021a scores “Good” whilst PPW025 (preferred option) only scores “Fair”.

Conclusion

In conclusion, there are real concerns in respect of the preferred option of PPW025, which has not been thoroughly assessed, and which represents a less sustainable option that site PPW021a which should be allocated instead. The information contained within these submissions and the evidence base referred to, demonstrates that site PPW021a provides an exciting and sustainable opportunity to provide new development in Prees with the added benefits of additional open space to serve the community as well as the provision of retail until. The site is deliverable with no insurmountable constraints and should be allocated in preference to site PPW025.

Planning application 14/03511/OUT

Prees Parish Council has considered this application and objects to the development of 31 houses on land adjacent to Tudor House for the following reasons:

1. Prees Parish Council and the local community actively engaged in the process of developing a set of new planning polices for Shropshire. Prees identified itself along with Higher Heath as a Community Cluster and set a housing target of 100 dwellings up to 2026, the life of the plan. In order to achieve this two sites in Prees were identified with community backing and community benefits and entered into SAMdev. These sites contribute some 70 houses towards the target; the remainder were to come from windfall sites and individual plots as had been the case over the past 25 yrs. Since then and largely due to the lack of a 5yrs supply of housing land the Parish Council has had a number of applications come forward that have had to be considered in the light of the NPPF's presumption in favour of development. These have all been outside the clusters development boundaries which are supposed to be being retained in SAMDev. In the last 2 years applications for 20 dwellings have been approved and a further 24 await a decision, of these at least 18 look likely to be approved. This will already exceed the total number of new dwellings anticipated for the Prees cluster until 2026. As outlined in proposed policy MD3 (extract from SAMdev) para 3. The settlement housing guideline is a significant policy consideration, where development would result in the number of completions plus outstanding permissions exceeding the guideline, decisions on whether to exceed the guide line will have regard to: the degree by which the guideline is exceeded, evidence of community support, the benefits arising from the development as well as the presumption in favour of development. This application if passed would exceed the Clusters guideline by over 30%.

2. This application has no direct community benefit apart from CIL which is applicable to all developments, had it come forward in SAMdev it is likely the Parish Council would have asked for it to include an open public green space/recreation area something which is severely lacking in Prees. Prees only has a very small play area on Brades Road and although the Prees Cricket and Recreation ground is identified as a public space it must be noted that it is not freely available to all members of the public being a private club with closed facilities for club members/teams. MD2 (extract from SAMdev) para 8 states that "For all developments of 20 dwellings or more, the open space needs to compromise a functional area for play and recreation", there is no provision or mention of provision of open space in the drawings or planning statement for the application.

3. The Parish Council believes that now that Shropshire Council has confirmed that it does have a 5 yr supply of housing land considerable weight can now be given to Local Plans, the Core Strategy has been adopted and should therefore carry significant weight, it indicates (section CS4 paragraphs 4.68, 4.69 and 4.70) that Community Clusters will be developed after public consultation, development will be within Villages as windfall development adjoining villages is not acceptable and Community Clusters will be able to retain their Settlement Boundaries. This application does not meet any of this criteria, it will develop the village beyond its boundary and has not been subject to community consultation. The Parish Council held a public meeting attended by 75 to 80 local residents , many of whom spoke in objection to the application and none of whom spoke in support.

Public opinion in Prees is against this application as demonstrated by the number of objections submitted to Shropshire Council. The site is not included in the emerging SAMDev document, although not yet adopted this has been through rigorous public consultation and has been submitted to the Secretary of State for examination. In Shropshire Council's own view, Shropshire Five Year Housing Land Supply Statement Data to 31st March 2014 (Amended Version 12th August 2014) para 3.18 it should therefore be afforded some weight.

4. Flood risk. The site is acknowledged as a Zone 1 risk area and sits adjacent to a Zone 3 risk area there is no physical boundary merely by a line drawn on a map. Many of the comments from local residents have included concerns about building on this site so close to a flood zone and experience shows that this land does flood regularly and not necessarily respecting the boundaries drawn in the Flood Risk Assessment. The NPPF para 101 indicates that the aim of the sequential test is to steer new development to areas with a lower probability of flooding and that the development must be safe for its life time taking account of the vulnerability of its users, with out increasing flood risk else where. The Parish Council do not think it is sensible to build on this area due to the likely hood of flooding, the inclusion of measures to mitigate run off rates only serves to demonstrate that the site is considered at risk. The proposed opening up of the water course (Strine Brook)is potentially going to increase the risk of flooding further down the brook, there appears to be no attempt to assess this risk or provide evidence it can be prevented. While there are other more suitable sites approved and allocated in SAMdev which more than meet the Clusters housing guideline the Parish Council dose not support development on this site. The community benefit does not in this case out weigh the risk of building in an area known to be at risk of flooding.

5. Prees has been identified as part of the Prees Cluster and can therefore be considered to support sustainable development. However there is a limit to how much and where the development should be located to preserve the life style and safety of the residents. This application will increase the amount of vehicular traffic and pedestrians using the Whitchurch Road into the centre of the village to access services. The road out side Tudor house is very narrow, one side being allocated residential parking which effectively renders the road single carriage way. The pavements at this point are also very narrow presenting a risk to parents with young children and push chairs. Increasing the traffic from this new development has the potential to compromise road safety in the centre of the village and increase the potentially hazardous for pedestrians, speed limits and double yellow lines are completely ignored in spite of efforts by the Parish Council to secure some form of enforcement and already create a hazardous situation at peak times. There have been several occasions where the roads have been blocked to buses and emergency service vehicles by thoughtless parking and the volume of traffic. This situation will inhibit the long term sustainability of Prees unless it is addressed and further traffic from this development will only exacerbate the situation.

6. It is know that the Strine Brook accommodates water voles and this habitat should be assessed and protected. The proposal in the flood risk assessment "this existing watercourse channel will be cleaned, which will likely provide increased capacity for any potential flooding and will also accommodate the surface water drainage for the development" has the potential to damage the water voles habitat and its impact should be fully assessed before the site is considered further.

7. Historic environment. Prees village centre is a conservation area and the site is adjacent or opposite a number of listed buildings. This developments impact on this historic area must not be over looked. The location of the site on a plateau that in some places is 2m lower that the adjacent Whitchurch Road will not render its appearance in keeping with either the listed buildings or the properties opposite the length of the site. As the application is for out line development only it is impossible to say what the street scene will look like or if it can be designed in keeping with the surrounding area and what its impact on the historic environment is likely to be.

8. Transport. In has been noted that Prees has a bus service 511 whose timetable is included in the planning statement however it also needs to be noted that this service does not run beyond 15.30 hours in the week (only 14.00 hours during school holidays) and not at all on a Sunday, neither does the service run to Prees Station. This renders the bus service a useless option as a means of transport to and from work. Prees station itself is somewhat remote from the village centre (actually being located in the neighbouring Parish) along a twisty country lane with no pavement, no street lighting and an unrestricted speed limit for much of its length. The station is unmanned and has no car park, therefore its use as a regular mode of transport for residents of Prees has little appeal.

In conclusion Prees Parish Council does not accept that this is sustainable development at its best and the site and level of development is not considered appropriate for Prees. The proposal will give rise to adverse impacts on the community, landscape and conservation area which will significantly and demonstrably out weigh the benefits of the scheme on the context of the presumption in favour of sustainable development. The statement that Shropshire now has a 5 yr supply of housing land has to significantly change the way applications are considered, as it did when there was a lack of a 5yr supply. The weight of public opinion is against the development and if the Parish Councils objections are to be over ruled it can not justifiably be by a process of delegated authority and must be referred to the area planning committee.

Mr. Nigel Thorns
Nigel Thorns Planning Consultancy
[redacted]

Our ref: SV/2015/108478/01-L01
Your ref: 14/40

Date: 15 June 2015

Dear Mr. Thorns

HYDRAULIC MODELLING REPORT AND REVISED FLOOD PLAN & LOCATION PLAN RELATING TO OUTLINE APPLICATION REF. 14/03511/OUT FOR THE ERECTION OF 31 DWELLINGS INCLUDING PROVISION OF ACCESS AT LAND ADJ TUDOR HOUSE, WHITCHURCH ROAD, PREES, WHITCHURCH SHROPSHIRE

I refer to your email and enclosures submitted in relation to the above proposed development, which we received on 19 May 2015. The information submitted consists of:

- 'Technical Note: Whitchurch Road Hydraulic Model' undertaken by ESI, dated May 2015, ref. 63053 TN1;
- Flood Plan, drawing no. W14/2318/SK10 Rev. A, dated 18 May 2015;
- Proposed Site Plan, drawing no. W14/2318/02 Rev. A, dated 18 May 2015.

We note that the information has been submitted to address the points raised in our response (our letter dated 27 October 2014, ref. SV/2014/108063/01) to planning application ref. 14/03511/OUT. We have reviewed the information and have the following comments to make:

Hydraulic Flood Modelling:
The technical note by ESI confirms that a hydraulic model of the Strine Brook has been undertaken, which includes blockage scenarios on the downstream culvert. The flow estimations used are based on the Flood Estimation Handbook (FEH) dataset and the flow has been increased by 20% to calculate the 1 in 100 year plus climate change flow. This is an industry standard method of working and is considered acceptable.

There is a difference in flow estimation between the figures ESI have obtained and the figures we have access to. ESI have calculated the projected flow during a 1 in 100 year plus climate change event to be 3.66 m^3s based on a 1 in 100 year flow of 3.05m^3s plus 20%. However we calculate this same 1 in 100 year flow to be 4.2m^3s, making the 1 in 100 year plus climate change projection 5.04m^3s. This may be down to variations between the two different datasets.

Although the method used to calculate flow is acceptable, we would expect a range of flow estimation methods to be used and a precautionary flow selected to inform the hydraulic model. The technical note should either confirm that a range of methods were

used and the precautionary flow was selected, or alternatively the 1 in 1000 year flow and associated projected flood level from the ESI report should be used, which we believe would be closer to the 1 in 100 year plus climate change projected flood level using our calculated flow. This would give a projected 1 in 100 year plus climate change flood level of 85.14m AOD with no downstream blockages.

The technical note has also given projected levels for partial blockage scenarios (20% and 50%) as requested. This would further raise the projected 1 in 100 year plus climate change flood level to 85.33m AOD (for a 50% scenario).

These levels should be used to inform safe development requirements within a revised FRA as part of the planning application submission.

Proposed development (FRA):
We note from the Proposed Site Plan that the site layout has changed from the original submission and is now for 27 dwellings including provision for access.

The findings of the hydraulic model (and above comments) should be used to update a FRA for submission as part of the outline planning application.

The outline drawings and topographical survey submitted suggest that the proposed dwellings would be located outside of the floodplain and that a safe pedestrian access would be available. However, the flood outline should be updated on the plans in light of the above comments on the hydraulic model.

The vehicular access would flood on a short section of the main access road through the site based on the current proposed site plan and flood plan of the site. We would encourage all built development to be located outside of the floodplain within Flood Zone 1. The drawings submitted address potential minor flooding of the access road by raising the access road ground levels and providing associated compensatory flood storage on the opposite side of the road. Normally, we would question the provision of flood storage compensation to enabling development of a site. However, in this instance we acknowledge the suggestion that the volume of flood storage compensation required would not be significant. Notwithstanding this, any flood storage compensation proposal would need to be on a level for level, volume for volume basis in order to replicate the existing flooding regime. Whilst we appreciate that this is an outline application, the FRA would need to include at this stage flood storage calculations detailing gains and losses on a level for level, volume for volume basis to demonstrate that flooding elsewhere would not be increased.

In addition to confirming a safe pedestrian access, the updated FRA should provide information on the finished floor levels of the proposed dwellings in addressing safe development requirements. Finished floor levels should be set at least 600mm above the 1 in 100 year plus climate change flood level and have regard to the blockage scenario levels.

I trust that the above comments are of use. Once we have received further clarification on the above points in an updated FRA for the site we will be able to comment further on the proposed development and confirm our position in relation to the planning application submission.

Cont/d..

Yours sincerely

Mrs Rachel Whiteman
Senior Planning Advisor

[redacted]

cc Shropshire Council

End

Martin Parrish

From:
Sent:
To:
Cc:
Subject:

Dear Sir,

With reference to the above subject we comment as follows:-

We have continually written to Shropshire County Council Planning Dept for over 3 years requesting a meeting to discuss the above site to which Shropshire County Council have completely ignored our requests.

We wrote again to you on 20/07/20 to which over a month down the line we still have had no reply.

This is totally unacceptable and unprofessional to ignore such requests, Shropshire County Council Planning Dept are a service to the public who are paid for by the tax payer i.e the public in providing a service and therefore should respect such requests.
Due to Shropshire County Council Planning Dept lack of coordination / responses to our request for a meeting, our Site PPW021a has been totally ignored and has not even been considered in the preferred option plan.

There is a trail of letters/ correspondence including your own internal assessment report Appendix B 18 issued 03/06/19 which highlights the site PPW025 as not being suitable, Further correspondence back to 2014 /2015 also highlights problems with PPW025 site with regards to flooding and not being what the village wanted to the extent the application was withdrawn as not suitable.

All this correspondence is available and will form part of Regulation 18 pre-submission Draft of the Shropshire Local Plan response document.

We will also be contacting the Planning Inspector and our local MP as it is categorically clear Shropshire County Council Planning Dept have not followed your own/ Government guidelines.

We look forward to a positive response from yourselves so we can discuss for a clear path forward.

Yours Sincerely

Mr J.P.Thorpe

Shropshire Council,
Planning Policy & Strategy Team,
Shirehall,
Abbey Foregate,
Shrewsbury,
Shropshire, SY2 6ND

17th September 2020

Our Ref 102-378

Dear Sirs

Re PPW021a

Please find attached a detailed submission prepared by our client Mr Jerry Thorpe, the owner of the land identified as PPW021a within the SLAA documentation.

This submission is basically divided into two sections, firstly the justification for site PPW021a to be given further consideration and secondly the failure to understand why site PPW025 has been promoted as a suitable site, in preference to PPW021a.

It is not intended to repeat the contents of our client's submission nor the detailed information supplied during the course of the relevant consultation which you will have available on file.

Indeed, the detailed information supplied relating to the potential of the development appears to have received limited consideration. Detailed plans and reports showed clearly that there would be work necessary in flood zones 2 and 3 in order to provide a suitable access road and junction improvements.

As a result of such work, opportunity would arise to alleviate existing flood problems, including the provision of balancing ponds within the site.

At no time has there been any intention to construct residential units within the flood zones and the relevant works will ensure that all residents would be able to assess their homes both by vehicle and on foot at all times.

Furthermore, development of our client's site would provide for extensive public

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open space for the use of all village residents and the provision of a small shop to serve both proposed and existing residents in the surrounding area.

The site would also enable a greater number of units, including affordable houses and bungalows, to be provided over the plan period than site PPW025.

Reference is made in highway comments to the proposal amounting to potentially 198 homes, which is unsubstantiated, the submitted indicative layout plan shows a maximum of 60 dwellings, final numbers are open to detailed discussion and to include possible phasing of the development over the plan period as appropriate.

With regard to the documentation relating to the Community Hub of Prees, a number of criteria are set out for all sites and the following Council conclusions reached regards to overall sustainability resulted: -

Site Ref: PPW021a – Overall score - 1 Conclusion Good
Site Ref: PPW025 - Overall score – 5 Conclusion Fair

Both sites were identified as being within either partly or wholly land within Flood Zone 2 or 3.

Historically site PPW021a has no record of previous consultations within the LPA prior to the current SLAA considerations, but strong objections have been raised previously to the development on PPW025 which are included in the documentation submitted by our client and are available in Council records.

In Site Assessment – Stage 3 for PPW021a it states: -

Percentage of site in Flood Zone 3 – 23%
Percentage of site in Flood Zone 2 – 25%
Percentage of site in Flood Zone 1 – 75%

Resulting in an overall percentage of 123% how can this be explained.

Furthermore, the percentage of the site in the 100-year surface flood risk area is only 1% rising to 7% in the 1000-year calculation.

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The above figures throw considerable doubt on the figures contained within the strategic considerations which quote much of the site 25% and 23% as being within Flood Zones 2 and 3.

None of the site subject to flooding will be intended for the siting of residential units and their associated gardens and the access road will be above the flood level.

The access road will be above the flood zone level with only recreational and open space safeguarded for nature conservation would remain in such flood areas.

A conclusion has been reached that the site access is severely restrained by the flood zone with minimal/nil account having been taken of the proposed improvements to enable such safe access as set out in the documentation provided throughout the SLAA process.

It is completely refuted that the development of this site would result in backland development.

The site would be fully served by a new access road and junction onto a road frontage i.e. Mill Street and such an arrangement reflects various new developments in all forms of locations throughout Shropshire and the potential benefit of developing this site as a whole have not been given due consideration.

Site PPW21a scored higher in the sustainability assessment than PPW025 and PPW021a is closer to the main recreational area, playing fields and children's playground than the PPW025 whilst the distance from the proposed site entrance on Mill Street to the main shopping area would not be dissimilar to that from PPW025.

Reference is made to Site PPW021a being contaminated but our client is unclear as to what contamination is understood to exist and where such information has been obtained from, please clarify.

The development of site PPW021a would bring long term benefits to the village in relation to addressing flooding issues, the inclusion of Public Open Space taking advantage of the existence of the brook and proposed balancing ponds, the provision of a new retail unit, new access junction and associated improvements to Mill Street , together with the provision of affordable housing and bungalows on a site immediately adjacent to the main village.

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To conclude, Site PPW021a offers considerably more benefits to local residents than PPW025 and due regard has not been given to the information submitted seeking its inclusion as a preferred site, as opposed to PPW025 which offers no benefits, other than the dwellings themselves to the village of Prees.

Despite numerous requests for meetings throughout the SLAA process to discuss the merits of the site with officers no response has been received despite assurances from officers at all levels including senior management who have merely suggested contacting officers who have failed to respond previously.

Yours faithfully

D Richards
Planning Manager

Direct Dial 01743 648453

dave@planning-group.co.uk

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Shingler Group

J Thorpe
c/o The Planning Group Ltd
The Swallows
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Dear Jerry

Re Local Plan Ref PPW021(a) Lighteach Road Prees

Thank you for the opportunity to review your Local Plan Review submission, as you are aware we have been considering the site for some time and have now had the opportunity to undertake a viability appraisal and confirm that we can deliver the site in two phases, Phase 1 as indicated on the updated plan in years 1-5, and phase 2 in years 6-10 of the plan period. We will deliver the much-needed retail unit and provide 20% affordable housing which is in excess of the requirement set out in local plan policies.

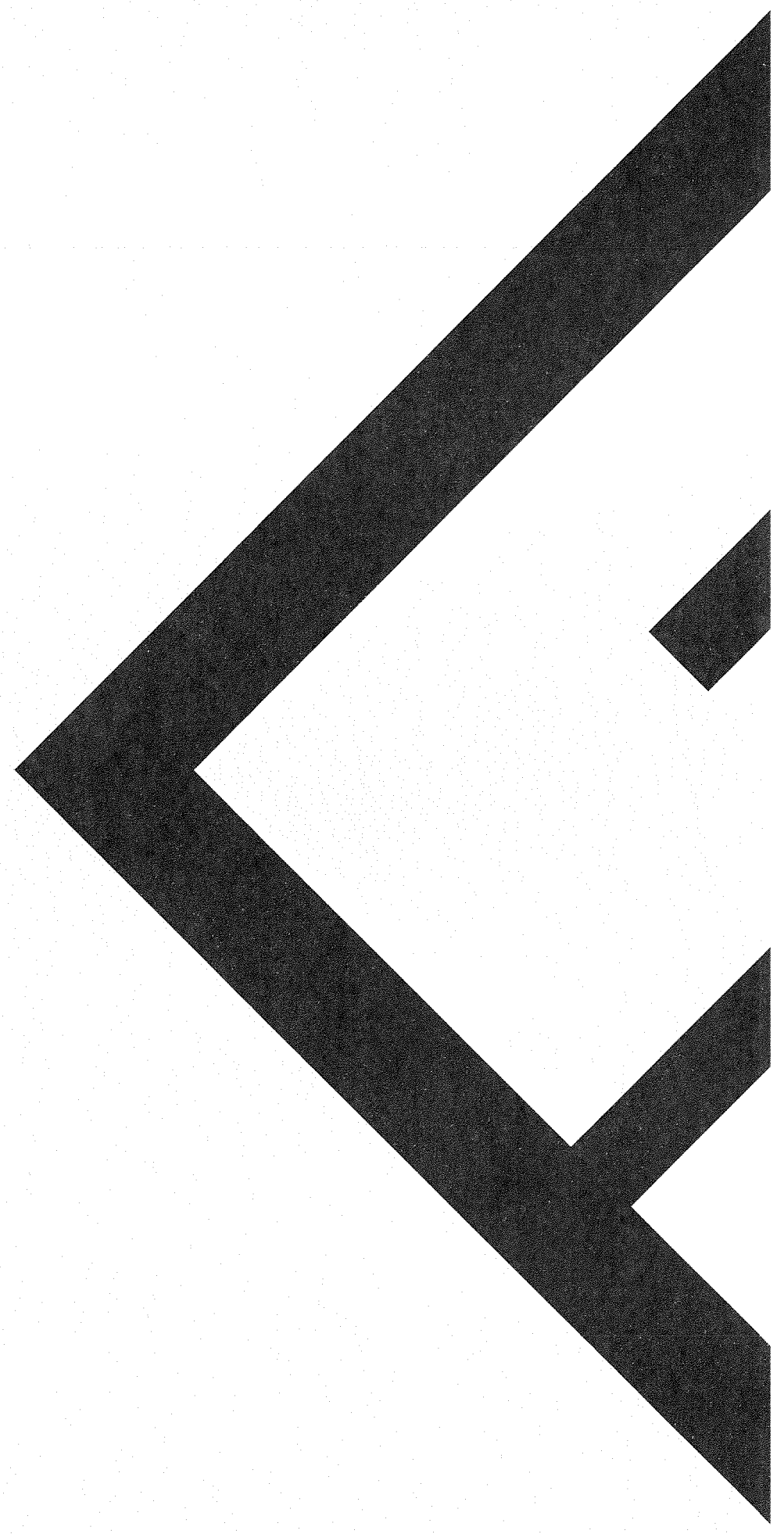
Subject to contract, we would like to be legally secure by way of an option agreement which will allow us to finalise our detailed proposals and move forward with representations through the Local Plan Review and/or a planning application to move matters forward.

Please confirm your agreement to move matters forward legally and we look forward to working with you and your agent on this matter.

Yours sincerely

Jeremy Shingler

Managing Director
For Shingler Group



Martin Parrish

From: Dave Richards
Sent: 16 November 2020 15:22
To: Martin Parrish
Subject: Prees
Attachments: Letter to SC regulation 18 consultation.doc

Good afternoon Eddie

Further to our discussions on Thursday 12 November regarding the Regulation 18 Consultation you requested further clarification on a number of issues discussed and these are as follows:-

Site PPW021(a) Lighteach Road Prees.

1. We advised that the site could be developed in phases exact details of which can be agreed but in order to show how we consider this could be accomplished to the benefit of all we attach a draft plan showing layout and phasing.
2. The housing would comprise of a mixed development including affordable housing, potentially in excess of the percentage required in North Shropshire, a variety of terraced, semi and detached dwellings and retirement bungalows .
3. It is intended to provide a general shop at the entrance to the development which will benefit proposed occupiers and existing residents in the area. Such a shop would have the benefit of people being able to park close to the unit as opposed to the limited parking available close to the shops on the main road. The shop will provide local employment in the area.
4. The layout will involve large areas for public open space with the provisions of walkways both through the development and along side the existing brook, additional landscaping and resultant improvements to the ecological value of the area. Prees is lacking in such informal recreational area as the main open space evolves around the recreation grounds for obvious reasons are not suitable for dog walking, informal family activities, cycling etc.
5. Cleaning out of brook, general improvements to it, the provision of balancing ponds and attenuation tanks all to help address current flooding issues in the lower part of the field close to the bridge. Such measures will benefit nearby properties and alleviate flooding further downstream.
6. The site is in the heart of the village close to childrens playground and the large recreational facility for the village.
7. For the avoidance of any doubt all residential units and shop will be situated outside the identified flood area with only the access road having to be provided in it but this will at such a level as to ensure it will not flood. Similarly the flood alleviation scheme will account for any such work .
8. The site provides the opportunity for further growth should the need arise due to housing requirements not only in Shropshire but throughout the country having to be increased above current estimates.
9. The mix of housing will support all aspects of the social and economic needs of the village offering valuable support for the school, various retail outlets and businesses.

It is therefore concluded that the development of the above site has greater benefits for existing and future residents of Prees than site PPW025 and we would draw your attention to the attached letter dated 17 September 2020 and sent to the Council on 21 September which addresses these issues in more detail .

During our discussion last week you intimated that the preferred site had the benefits of being an infill site directly onto the main road adjacent to the medical centre. This acknowledged but the site is restricted in size due to a significant part of it flooding and a resultant cramped form of development not comparable to the spacious layout available on Site 021(a).

Site 025 is sited at a considerable distance from the recreational facilities including football pitches ,cricket pitch and bowling green together with childrens playground all on Brades Road with parents and children having to walk along

the main road to access such facilities and therefor the site 021(a) is clearly the more sustainable location within the village.

You also made reference to site 021(a) being regarded as backland development and we strongly disagree with this interpretation. The site has its own frontage onto Station Road with a full estate road being provided into the site. Whilst part of the development will be to the rear of some existing houses this form of development has been supported throughout the county .

This letter should be read in association with all previous submitted documents and we should be grateful if you would give this matter your further consideration as a matter of urgency.

Regards

Dave Richards

Planning Manager

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0 10 20 30 40 50

SCALE BAR

SITE AREA = 66,170 m2 (16.35 Acres)

NORTH

POTENTIAL HOUSE TYPES:
(Layout shown indicative)

16No. 2 Bed Semis.
16No. 3 Bed Semis..
14No. 3 Bed Detached.
8 No. Bungalows.
6 No. 4/5 Bed Detached.

NOTE : SITE LAYOUT INDICATIVE ONLY

IMPORTANT GENERAL NOTES:

THIS DRAWING SHALL NOT BE SCALED.

ALL DIMENSIONS SHALL BE CHECKED ON SITE PRIOR TO COMMENCING THE WORKS WITH ANY ERRORS OR OMISSION REPORTED TO THE ARCHITECT IMMEDIATELY.

ALL DIMENSIONS ARE IN mm UNLESS OTHERWISE NOTED.

THIS DRAWING MAY INCORPORATE INFORMATION FROM OTHER PROFESSIONS. DGA CANNOT ACCEPT RESPONSIBILITY FOR THE INTEGRITY AND ACCURACY OF SUCH INFORMATION.

IF IN DOUBT ASK !!

Revision

Rev		Date	By	App
-		-	-	-

DGA ARCHITECTURE INTERIOR DESIGN

DGA Architects Ltd . The Studio . 125 Belle Vue Road
Shrewsbury . Shropshire . SY3 7NJ
01743 272265 . design@dgaltd.co.uk . www.dgaltd.co.uk

Client
THE PLANNING GROUP LTD

Project
POTENTIAL DEVELOPMENT LAND. PREES, SHROPSHIRE. SY13 2DR

Drawing
INDICATIVE SITE LAYOUT

Drawing status
PLANNING ENQUIRY

Scale	Drawn by	Date
1:1500@A3 1:750@A1	ED	NOV 18

Project number	Drawing number	Revision
18.040	1.00	

Sumner Consultancy Ltd
Civil Engineering &
Transportation Consultant

FLOOD RISK ASSESSMENT

FOR A PROPOSED DEVELOPMENT
OFF
MILL STREET & LIGHTEACH ROAD PREES

FOR

MR JERRY THORPE

REPORT VERIFICATION

SITE ADDRESS	Mill Street & Lighteach Road Prees
REPORT TITLE	Flood Risk Assessment
JOB NUMBER	161-17
PREPARED BY	JRS

ISSUE NO.	DATE	STATUS	REPORT VERSION	ISSUED BY
1	15-02-17	Final for Planning	01	JRS

INTRODUCTION

1.1 Project Scope

1.1.1 Sumner Consultancy has been commissioned by Mr Jerry Thorp to carry out a flood risk assessment for a proposed residential development off Mill Street Prees Whitchurch Shropshire.

1.1.2 It is understood that this Flood Risk Assessment will be submitted to the Planning Authority and Environment Agency (Agency, hereafter) as part of a planning application. Specifically, this assessment intends to:

a) Consider the impacts of a range of fluvial flood events (all inclusive of climate change), in accordance with NPPF and NPPF Technical Guidance;

b) Review any literature and guidance specific to this area;

c) Determine the extents of the aforementioned NPPF and NPPF Technical Guidance Flood Zones across the site;

d) Assess the risks to people and property and propose mitigation measures accordingly;

e) Review existing evacuation and warning procedures for the area;

f) Carry out an appraisal of flood risk from any other sources such as groundwater as required by NPPF and NPPF Technical Guidance;

g) Develop a post-development management plan/drainage strategy for surface water across the site, which considers the use of SUDS and alternative methods of surface water disposal;

h) Report findings and recommendations.

1.1.3 This assessment is carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) and associated Technical Guidance, both dated March 2012. Other documents which have been consulted include:

- DEFRA/EA document entitled *Framework and guidance for assessing and managing flood risk for new development Phase 2 (FD2320/TR2)*, 2005;
- Communities and Local Government 2007. *Improving the Flood Performance of New Buildings*. HMSO.
- DEFRA/EA document entitled *The flood risks to people methodology (FD2321/TR1),* 2006;
- EA *Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose*, 2008;

2. DATA COLLECTION

2.1 To assist with this report, the data collected included:

- 1:250,000 *Soil Map of Midland and Western England* (Sheet 3) published by Cranfield University and Soil Survey of England and Wales 1983.
- 1:625,000 *Hydrogeological Map of England and Wales*, published in 1977 by the Institute of Geological Sciences (now the British Geological Survey).
- British Geological Society, *Groundwater Flooding Susceptibility Map* (obtained via Promap).
- EA flood zone GIS layers (obtained via Promap).

3. SITE CHARACTERISTICS

3.1 Existing Site Characteristics and Location

3.1.1 The site is located off Mill Street, Prees, Shropshire. The approximate Ordnance Survey (OS) grid reference for the site is 355140 333760 and the location of the site is shown on Figure 1.

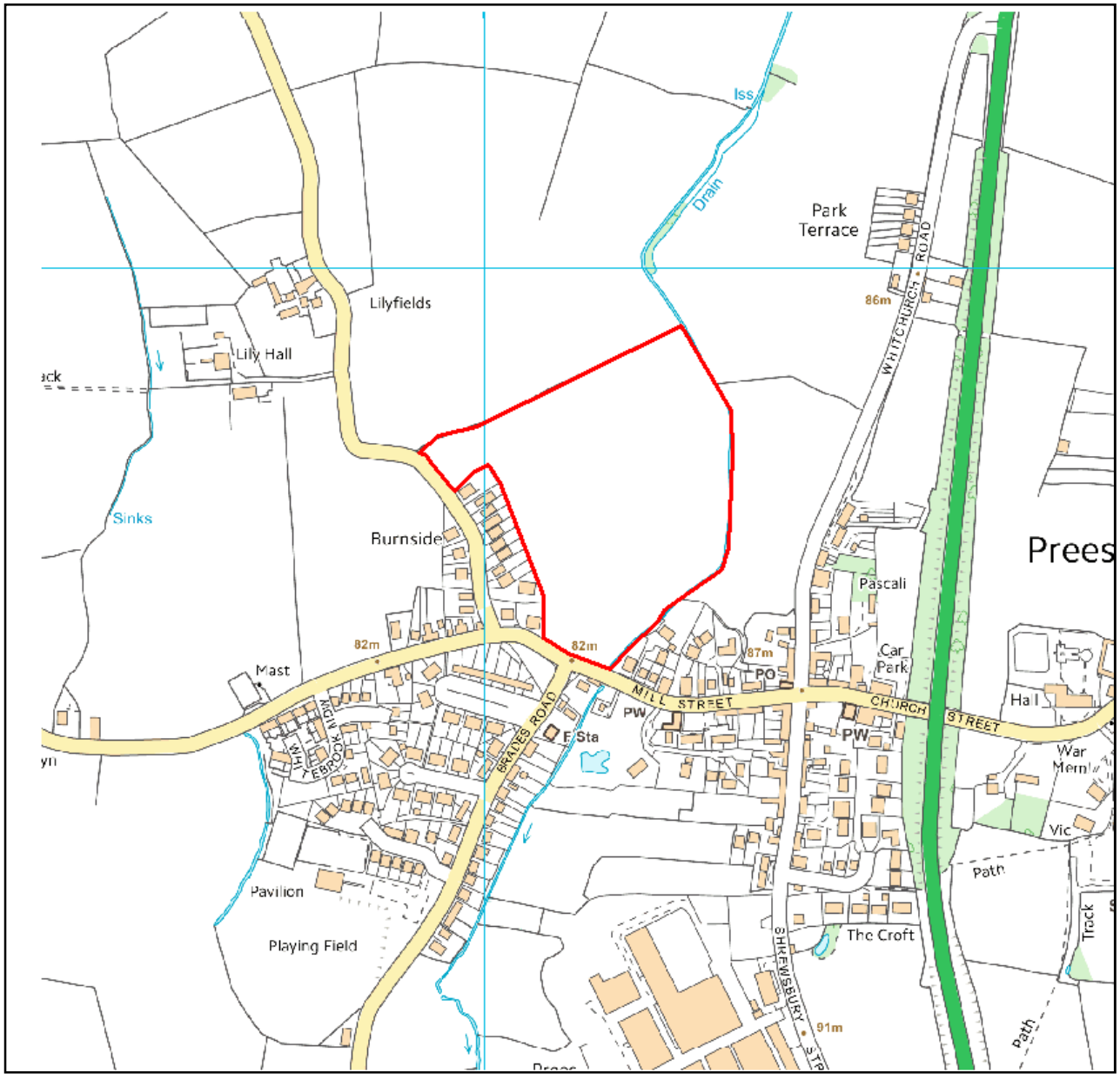


Figure 1: Site location plan (Source: Ordnance Survey, 2014)

3.1.2 The site comprises an undeveloped field and covers an area of approximately 6.6 ha. The northwest frontage of the site is bounded by an undeveloped field and the eastern frontage of the site is bounded by watercourse which flows in a south to south west direction. The south frontage of the site is bounded by Mill Street which runs in a north west to south east direction. The south western frontage of the site is bounded by residential dwellings and in part Lighteach Road from which access onto the site is currently achieved.

3.1.3 By consulting the OS maps for the area it can be seen that ground levels across the site fall in a south to south westerly direction.

3.2 Site Proposals

3.2.1 It is the Client's intention to develop the site with approximately 40 residential dwellings together with driveways, car parking areas, open space and access roads.

3.2.2 Access onto the site is available from either from Lighteach Road or Mill Street, both of which will be appraised further in this report.

4. BASELINE INFORMATION

4.1 Environment Agency Flood Zone Map

4.1.1 The Environment Agency's Flood Zone Map (Figure 2) shows that the site is located within the NPPF defined Flood Zone 3 and Flood Zone 1 associated with the watercourse located adjacent to the eastern frontage of the site.

4.1.2 The Flood Zone 3 is divided into two sub-categories, the Flood Zone 3a and Flood Zone 3b. The extent of the Flood Zone 3a 'High Probability' is defined as the 1 in 100 year return period fluvial event in this case.

4.1.3 The maps do not show the extent of the functional floodplain (Flood Zone 3b). Flood Zone 3b functional floodplain is defined in Table 1 of the NPPF Technical Guidance as the area where water flows or is stored during flood events. The functional floodplain is generally defined by the limit of the 1 in 20 year flood envelope.

4.1.4 The Flood Zone 2 'Medium Probability' floodplain is defined as having between a 1 in 100 year annual probability and 1 in 1000 year annual probability of flooding. The threshold of the Flood Zone 2 floodplain is the 1 in 1000 year extreme event.

4.1.5 The Flood Zone 1 'Low Probability' comprises land as having less than a 1 in 1000 year annual probability of fluvial (i.e. an event more severe than the extreme 1 in 1000 year event).

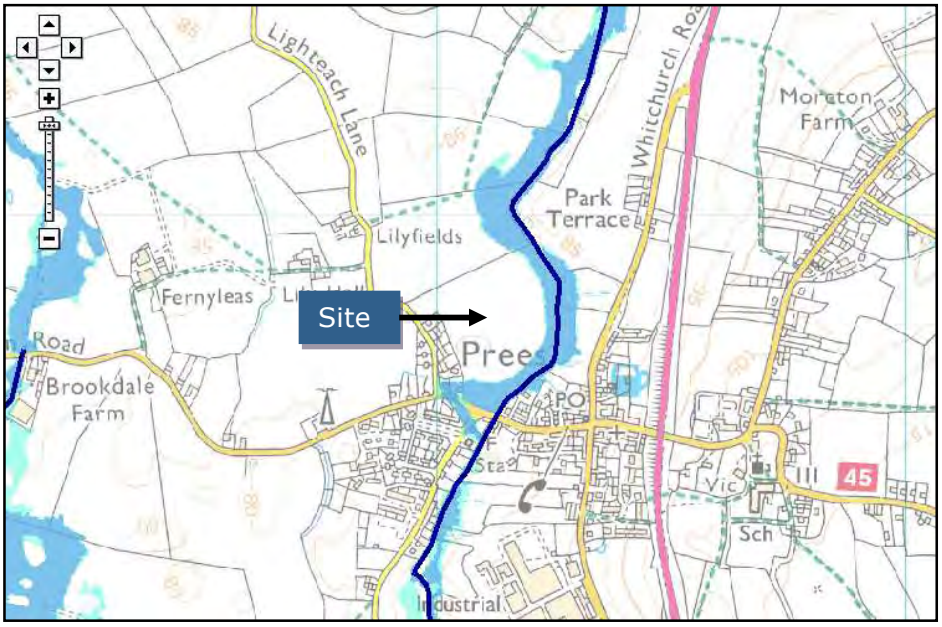


Figure 2: Environment Agency Flood Zone Map (Source: Environment Agency, 2014)

4.1.6 At the time of writing, flood levels had not been obtained from the Environment Agency. Therefore, the EA flood zones have been delineated across the site by superimposing the EA flood zone GIS layers (obtained via Promap) onto the OS map.

4.1.7 Figure 3 shows the mapped extents of the Flood Zones across the site. It is understood that all built development will be limited to the Flood Zone 1 where according to NPPF all uses of land are appropriate in this zone. Water-compatible uses such as open space are permitted within the Flood Zones 3 and 2 according to NPPF.

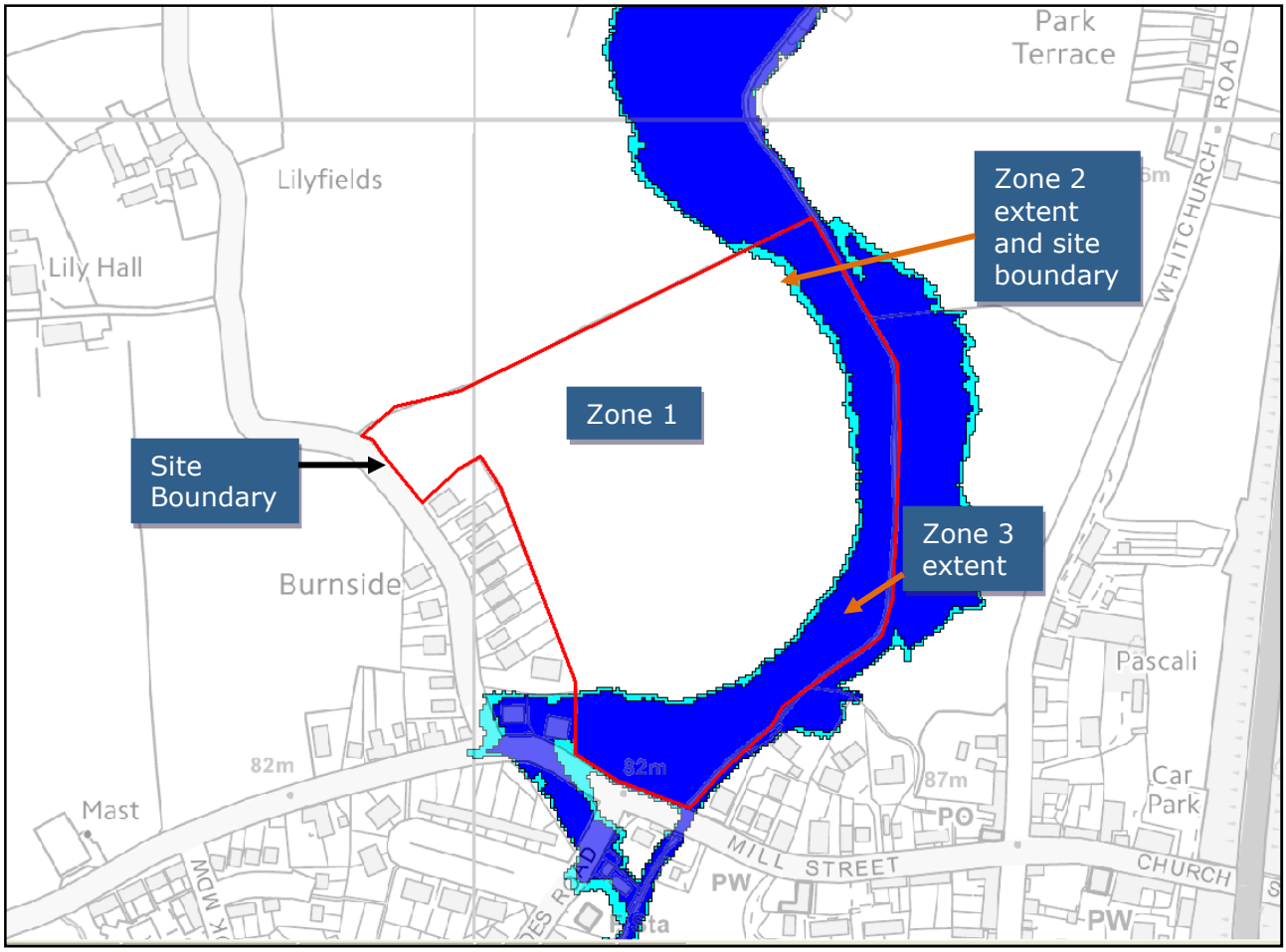


Figure 3: Flood Zones

4.2 Flood Warning and Emergency Planning

4.2.1 The site is located within Environment Agency Flood Alert. As meteorological conditions and corresponding flood levels are harder to predict across fluvial catchments for a certain area, sites at risk of fluvial flooding could have a minimum of 2 hours warning before any of the levels of flood warning is issued (the Agency's warning scheme only applies to areas at risk of flooding from main rivers and not IDB controlled drains).

4.2.3 According to the Met Office document entitled *Together – make a difference with a coordinated response to emergency management* dated 2013, EMARC is one of the forecast production units at the Met Office. It provides specialist forecasts to the UK emergency services and other government departments, as well as to the international community and has continuous operational capability. This enables the Met Office to provide an immediate response to customers requiring meteorological information to deal with a variety of environmental incidents. These could range from chemical or radiological releases to biological hazards such as foot and mouth disease.

4.2.4 The National Severe Weather Warning Service provides severe weather alerts and warnings to the general public and emergency responders, giving up to four days advance notice of disruptive weather conditions. These are updated daily in the run up to the weather event and include maps showing the risk of disruption across the UK.

4.2.5 Flood Alerts, Flood Warnings and Severe Flood Warnings are issued to residents and businesses within flood risk areas by the Agency's *Floodline Warnings Direct* (FWD) service. This system is managed by the Environment Agency and dials out a message to the recipient when a particular category of flood warning is being advised. The message is conveyed by a constant ringing of the telephone or can alternatively be communicated to mobile phones and computers. The system functions at all times, issuing flood warnings and alerts in conjunction with announcements on radio and other media. Owners and occupiers of dwellings or businesses thought to be at risk can sign up to the scheme. **The owners are encouraged to confirm details with the Agency and to sign up for these warnings.**

4.2.6 The Extended Warning Direct (EWD) service also takes advantage of more recent developments in technology and allows contact to be made through mobile phones and PC's. Information concerning the category of flood warning is also sent to the emergency services and local authorities who may need to mobilise and implement evacuation procedures.

4.2.7 A new Flood Forecasting Centre (FFC) has been set up between the Agency and Met Office and is intended to improve the lead time and accuracy of flood warnings issued to emergency services and other important services to assist them with emergency planning decisions.

4.2.8 The FFC issues daily guidance on all forms of flood risk across England and Wales while the Scottish Flood Forecasting Service performs the same function across Scotland. The FFC is now also responsible for issuing tidal alerts for the British coastline which helps the Environment Agency and the Scottish Environment Protection Agency assess the risk of coastal flooding and issue warnings when required. The various flood warning codes can be seen on Figure 4.

4.2.9 The Shropshire Council's Strategic Flood Risk Assessment (SFRA, hereafter) dated 2012, and Shropshire Multi-Agency Flood Plan dated 2012, suggests that during a major flood event, the Emergency Management Team will meet at the Council Emergency Centre and guide departments depending on the gathered information. The co-ordination of a multi-response to the incident is also directed from this centre. The decision for evacuation and the coordination of any such evacuation is conducted by the Police. The Council's role in evacuation is the welfare of those who have been evacuated, i.e. running of the evacuation/ rest centre. Information to residents will indicate who and which areas are being evacuated and at what time. Associated information on how to carry out the evacuation is also distributed to residents, for example, what is needed for them to bring and what assistance will be available.

4.2.10 Evacuation of residents will be directed towards allocated Council operated rest centres which consist of centres located outside of the floodplain, and which will be decided at the time of the emergency. These centres provide shelter, first aid and refreshment. Arrangements for pets will be established as best as possible and as soon as possible. As most people will leave the danger area by foot or by private vehicle this can cause traffic jams and panic. If the situation is urgent, any vehicle will need to be used to transport people out of the flood risk area, whereas if there is sufficient warning a transport strategy may be developed. Assembly points may be arranged in order to co-ordinate the movement of people on foot to a rest centre. Transportation to rest centres can be provided by the local authorities upon the instruction of the emergency services and priority can be given to the elderly and other vulnerable groups, although the council have a Duty of Care to all residents within the flood risk area. Volunteer groups such as St Johns Ambulance assist in the operation of these centres.

	**Flooding is possible – Be prepared**
	**Flooding is expected – Immediate action required**
	**Severe flooding – Danger to life**

Figure 4: Flood warning codes (Source: Environment Agency)

5. FLOOD RISK MITIGATION AND EVACUATION

5.1 Reducing Exposure to the Hazard

5.1.1 In order to assess and reduce the exposure to the hazard and the vulnerability to the hazard after the site has been developed, the guidance outlined in the DCLG/DEFRA/EA document entitled *Flood Risk Assessment Guidance for New Development Phase 2; Flood Risks to People, Phase 2; Improving the Flood Performance of New Buildings* has been consulted.

5.1.2 All built development will be located within the Flood Zone 1. Therefore, no mitigation measures to protect properties from fluvial flooding have been proposed.

5.1.3 Appropriate signage warning of the flood risk should be placed across parts of the site located within the Flood Zone 3 and 2, as these areas will remain as open space and maybe utilised by people for leisure purposes.

5.2 Reducing Vulnerability to the Hazard

5.2.1 Although people and property will remain safe across the site during all events up to and including the 1 in 1000 year event, people at the site are unlikely to have detailed knowledge of the dynamics of the flood event and the storminess of the event could result in people panicking or becoming anxious, particularly if they observe flooding across eastern parts of the site within the vicinity of the river.

5.2.2 The Agency aims to provide up to 2 hours notice before the issue of a *Flood Warning* for fluvial events. It is likely that the flood levels will be monitored by the Agency and the corresponding level of flood warning issued depending on the rising flood level. It is understood that the police and other emergency services will assist in the evacuation to rest centres operated by the Council. It is not mandatory for occupants to use these centres and personal evacuation arrangements can be just as effective. The Fire Service will assist in any rescuing of people from the flooded area once this has occurred.

5.2.3 As a precaution, it is recommended that the occupants liaise with the Agency in order to register with the Agency's Flood Warnings Direct service and ensure that they are aware of

the flood risk so that they have the option to escape/evacuate upon receipt of a *Flood Warning* or upon the instruction of the emergency services.

- 5.2.4 The occupants should develop a *Family Flood Plan*. Further guidance is offered in the Environment Agency's guidance document entitled *What to do before, during and after a flood*. The *Family Flood Plan* should consider, for example, information about vital medication needed and a *Flood Kit*.
- 5.2.5 It may be sensible to compile two *Flood Kit's* to suit each eventuality. For example, a smaller kit could be compiled which would allow the occupants to carry it during evacuation. A larger kit could also be compiled which included additional food and beverage items in case of ongoing safe refuge within the property.

5.2.6 Although there will be safe refuge across the site, it is not recommended that occupants remain within the buildings after the order for evacuation has been issued by the emergency services, unless the occupant is vulnerable (i.e. infirm) and the emergency services should be notified.

5.3 Safe Access/Egress

5.3.1 The occupants will be safe across the site as built development will be limited to the Flood Zone 1.

5.3.2 As mentioned earlier, two potential access points onto the site have been identified. These have been appraised individually.

Access from Mill Street (Access A)

5.3.3 Having a vehicular/pedestrian access point onto the site from Mill Street would require some land raising across southern parts of the site which are currently located in Flood Zones 3 and 2.

5.3.4 Ground levels across this part of the site are currently lower than Mill Street (Figure 5), therefore, ground raising will be required to permit access from Mill Street through this part of the site. Ground raising to above the flood level along the route of an access road would allow safe access/egress from the site and onto Mill Street which is located in Flood Zone 1.

5.3.5 A consequence of land raising in the Flood Zones 3 and 2 is the loss of flood volume/flood displacement and therefore flood compensation would be required across unaffected parts of the site which are currently in the Flood Zone 1. Further modelling and liaison with the Environment Agency would be required in order to ensure there is no impact on flood levels.

Figure 5: Photo showing southern parts of the site currently lower than Mill Street

Access from Lighteach Road (Access B)

5.3.6 Having vehicular/pedestrian access point onto the site from Lighteach Road would not require land raising or flood compensation as this area of the site is located in Flood Zone 1. Therefore, safe access/egress would be achieved from this point at all times.

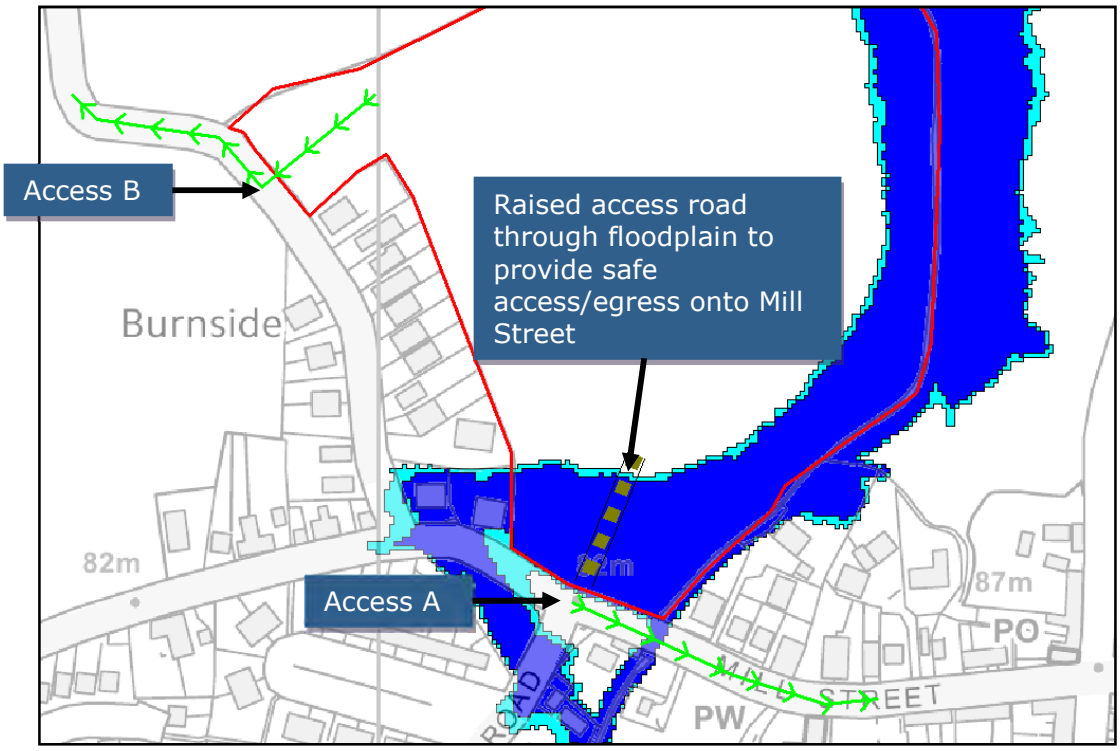


Figure 6: Potential evacuation routes

5.4 Insurance

5.4.1 The Association of British Insurers (ABI) published a guidance document in 2012 entitled *Guidance on Insurance and Planning in Flood Risk Areas for Local Planning Authorities in England*.

5.4.2 The ABI guidance sets out the requirements of the insurance industry when considering flood risk and insurability of the property. The guidance suggests that properties should be protected for flood events up to the 1 in 100 year event in order to access insurance at a competitive price.

5.4.3 The guidance also states that insurers would of course prefer to cover properties which are not at risk of flooding, however, for those properties which are at risk of flooding insurers would prefer that the properties are raised above the flood level, over resistance measures which prevent floodwater from entering the building, or resilience measures which allows floodwater to enter the building.

5.4.4 As all built development will be limited to the Flood Zone 1, the ABI's requirement of protection during a 1 in 100 year event will be exceeded and there will be a good chance of the properties being insured at a competitive rate.

6. OTHER SOURCES OF FLOODING

6.1 Groundwater Flooding

6.1.1 In order to assess the potential for groundwater flooding during higher return period rainfall events, the Jacobs/DEFRA report entitled *Strategy for Flood and Coastal Erosion Risk Management: Groundwater Flooding Scoping Study*, published in May 2004, was consulted, together with the guidance offered within the document entitled *Groundwater flooding records collation, monitoring and risk assessment (ref HA5)*, commissioned by DEFRA and carried out by Jacobs in 2006.

6.1.2 According to Cobby et al (2009), groundwater flooding can be defined as flooding caused by the emergence of water originating from subsurface permeable strata. The greatest risks of groundwater flooding are considered to be from either:

- a rise of groundwater in unconfined permeable strata, such as Chalk, after prolonged periods of extreme rainfall;
- a rise of groundwater in unconsolidated, permeable superficial deposits, which are in hydraulic continuity with local river water levels and where the hydraulic gradient of the water table is low.

6.1.3 Groundwater flooding from Chalk aquifers, for example, mainly occurs when the surface of the Chalk is close to, or outcrops at the ground surface. The rise in the water table during prolonged and extreme rainfall can be significant, especially if the Chalk aquifer is unconfined and if the original water level in the aquifer is high. Flooding from such aquifers may occur within a few hours or days of the rainfall or up to a few weeks after.

6.1.4 Deposits comprising a mixture of permeable and impermeable soils can lead to a presence of perched water. Perched water tables are located above less permeable deposits such as clay and are located within water-bearing soils such as sand and gravel. If perched water is unconfined then the potential for recharge and groundwater flooding can be high. If the perched water is confined by less permeable clay deposits, then the clay deposits will have a buffering effect on percolating surface water and thus the recharge potential and rise in the water table is low.

6.1.5 It is common for groundwater flooding from water-bearing superficial deposits to occur within the vicinity of watercourses, as the water table is generally in hydraulic continuity with the water levels in the watercourse. Therefore, if the watercourse floodplain is flat and low-lying, the water table is likely to have a low hydraulic gradient and will rise to the equivalent water level within the watercourse (Figure 7). This, in turn, can cause the water table to breach the ground surface. This is more prominent in winter during which groundwater flooding often precedes fluvial flooding.

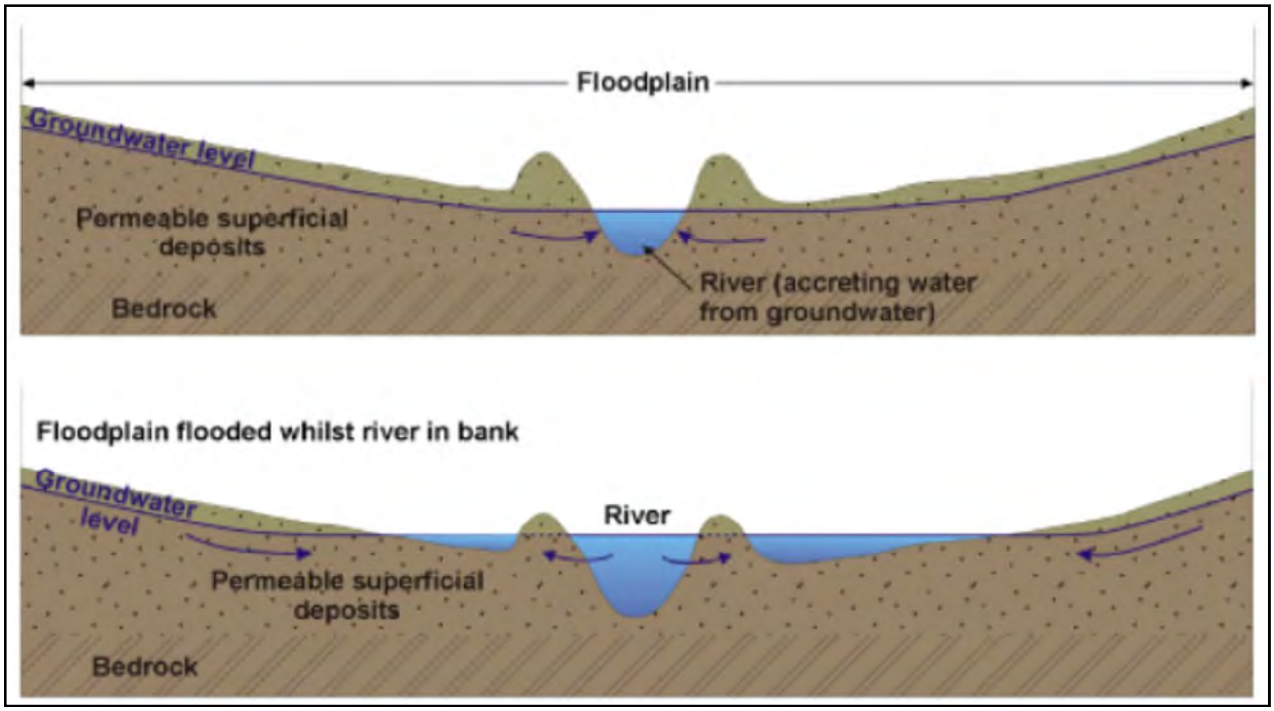


Figure 7: Schematic showing mechanisms of groundwater flooding from high in-bank water levels (Source: DEFRA Groundwater flooding records collation, monitoring and risk assessment (ref HA5))

Soil and Geology at the Site

6.1.6 It can be seen from the various soil and hydrogeological data, listed in Section 2, that the soils beneath the site comprise sand and gravel deposits overlying Mudstone.

6.1.7 Table 6 and equation 12 of the ADAS document entitled *Pipe Size Design for Field Drainage*, 1980, indicates that the soils in the area have a high Winter Rain Acceptance Potential (WRAP) and low Winter Runoff Potential.

Groundwater Flooding Potential at the Site

6.1.8 Reference to local borehole data obtained via the online BGS Geology Viewer indicates that the water table is likely to be approximately 2m below the ground surface. However, it is possible that due to the relatively flat and low-lying nature of the surrounding area, the water table below the site will have a low hydraulic gradient and will be in hydraulic continuity with the river. Therefore, if water levels rise within the river this could lead to an increase in the water table across adjacent areas (see paragraph 6.1.5 and Figure 7). There could be perched groundwater situated within the more permeable deposits below the site.

6.1.9 There have been no recorded groundwater flood events across the area between 2000 and 2003, as indicated by the Jacobs study. The BGS Groundwater Flooding Susceptibility Map,

however, indicates that there is "Potential for Groundwater Flooding of Property Situated Below Ground Level" and "Potential for Groundwater Flooding to Occur at Surface".

6.1.10 It is considered that the evidence suggests an overall moderate risk of groundwater flooding.

Recommendations

6.1.11 As there is a moderate risk of groundwater flooding across the site, the design and construction of the proposed dwellings should consider the possibility of potentially high water tables.

6.1.12 The dwellings should have a ground supported floor and should be approximately 150mm thick. A damp-proof membrane should also be included within the floor construction (Figure 8).

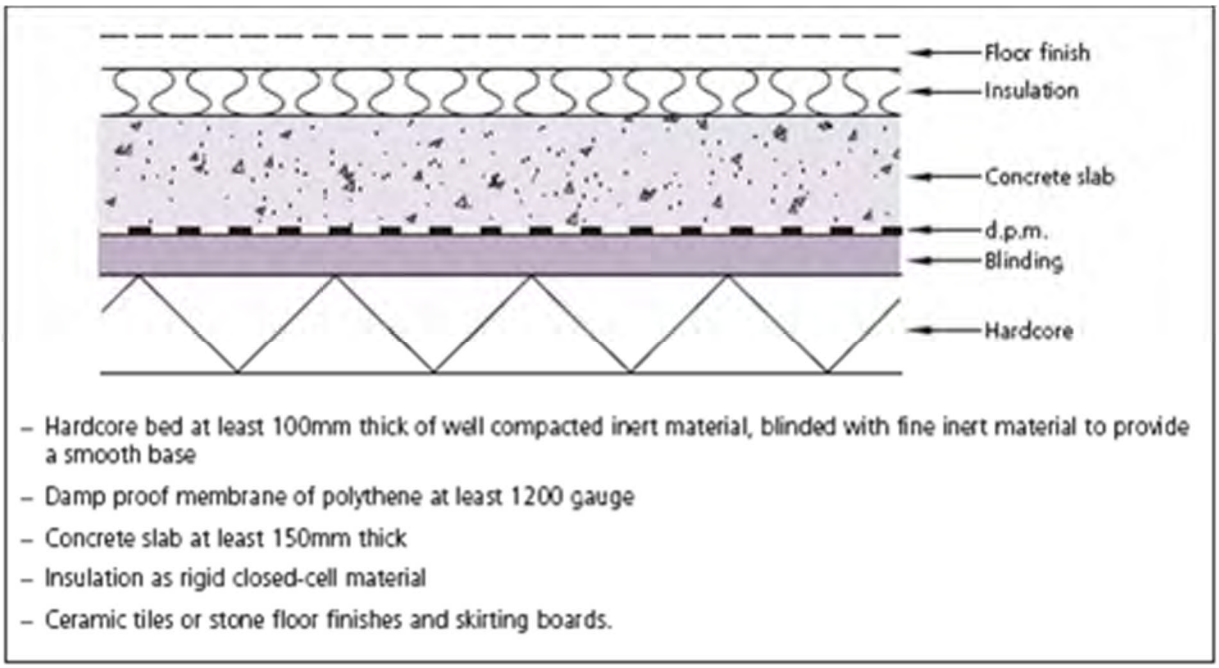


Figure 8: Ground-supported floor (Source: DCLG, *Improving the Flood Performance of New Buildings* 2007)

6.1.13 Shallow footings are likely to be used for the foundations at the site. Research suggests that groundwater can penetrate through blocks in the cavity walls, therefore it is recommended that a clear cavity of at least 225mm below the damp proof course to prevent build up of any mortar dropped during construction from having any detrimental effect on the performance of the wall. Concrete blocks used in foundations should be sealed with an impermeable material or encased in concrete to prevent water movement from the ground to the wall construction.

6.2 Surface Water Flooding and Sewer Flooding

6.2.1 Surface water and sewer flooding across urban areas is often a result of high intensity storm events which exceed the capacity of the sewers thus causing them to surcharge and flood. Poorly maintained sewer networks and blockages can also exacerbate the potential for sewer flooding.

6.2.2 The Agency's Surface Water Flooding Map indicates that there is generally a very low surface water flooding risk across the site.

6.3 Reservoirs, Canals And Other Artificial Sources

6.3.1 The failure of man-made infrastructure such as flood defences and other structures can result in unexpected flooding. Flooding from artificial sources such as reservoirs, canals and lakes can occur suddenly and without warning, leading to high depths and velocities of flood water which pose a safety risk to people and property.

6.3.2 The Environment Agency's "Risk of flooding from reservoirs" map suggests that the site is not at risk from reservoirs or other artificial sources.

7. SURFACE WATER DRAINAGE AND SUDS

7.1 Introduction

7.1.1 Planning policy recommends the maximum practical use of Sustainable Drainage Systems (SUDS) within proposals for new sites. There is a requirement that sustainable drainage systems (SUDS) be installed where appropriate, in order to limit the amount of surface water runoff entering drainage systems and to return surface water into the ground to follow its natural drainage path.

7.1.2 The National Planning Policy Framework (NPPF) and the Agency require that the effects of climate change to be considered in any assessment of flood risk for developments. When considering the impacts of climate change on rainfall intensity, NPPF advises that when designing surface water drainage systems for developments, an allowance of 30% for climate change should be included and when designing surface water drainage systems.

7.2 Existing Surface Water Drainage

7.2.1 It has been determined that surface water runoff from the existing site occurs mainly in a south to south westerly direction. A proportion of the surface water landing across the site will be infiltrating into the soils of the site and this proportion is denoted by an SPRHOST catchment descriptor value of 24.4 (i.e. 24.4% of the surface water landing on the site typically runs off leaving 75.6% to infiltrate).

7.2.2 In order to quantify the existing runoff rate from the site, the methodology outlined within the Institute of Hydrology Report Number 124 (IoH 124) entitled *Flood Estimation for Small Catchments*, has been adopted. This document together with the guidance stipulated in the *Interim Code of Practice for Sustainable Drainage Systems*, compiled by the National SUDS Working Group in July 2004, suggests that an estimation of peak runoff rates from areas below 50 ha, and up to 200 ha, can be derived from the calculated mean annual flood flow, QBAR.

7.2.3 The ICPSUDS function within the Microdrainage software Version 2014.1.1 can be used which implements IoH 124 method with a pro-rata below 50 ha. The SAAR value of 713mm has been determined from the catchment descriptors taken from the FEH CD-ROM Version 3. The soil value has been determined using the information from the Winter Rain Acceptance Potential (WRAP) map within the Flood Studies Report, 1975, together with Table 6 and equation 12 of the ADAS document entitled Pipe Size Design for Field Drainage, 1980. The resultant soil value of 0.30 was also checked for consistency with the digital geographical data within the Microdrainage software. The results can be seen on Figure 9.

		Page 1
	Existing runoff	
	Designed by Checked by	
Micro Drainage	Source Control 2014.1.1	

ICP SUDS Mean Annual Flood

Input

Return Period (years)	2	Soil	0.300
Area (ha)	6.600	Urban	0.000
SAAR (mm)	713	Region Number	Region 10

Results	l/s
QBAR Rural	12.3
QBAR Urban	12.3
Q2 years	11.4
Q1 year	10.7
Q30 years	20.8
Q100 years	25.6

Figure 9: Greenfield runoff rates for the existing site (Source: Microdrainage Version 2014.1.1)

7.3 Soil Types and SUDS Suitability

7.3.1 By consulting the relevant information outlined in Section 6.1, the soils beneath the site comprise sand and gravel deposits overlying Mudstone.

7.3.2 The soil types and expected infiltration rates across the site are considered sufficient for the infiltration of surface water, however, the expected high water table across the site would preclude the practical use of infiltration devices.

7.3.3 Instead of using infiltration across the site, pervious surfaces could be used to cleanse, store and transport surface water to a positive system located beneath the access road, as this will provide some source control. Surface water would then be directed to an attenuation basin or into oversized pipes (located beneath the highway).

7.3.4 The Environment Agency's website indicates that the site is not located within a Source Protection Zone associated with a groundwater abstraction point. Nevertheless, it is imperative that the pollution risk from any surface water soaking into the ground from hardstanding areas (which can carry pollutants such as oils and soap suds etc), is mitigated to prevent soil and water contamination.

7.4 Pervious Surfaces

7.4.1 It is proposed that the car parking areas and private driveways are constructed using pervious surfaces such as permeable block paving. Surface water from building roofs could then be drained onto, or into, these surfaces directly. This approach is described further in CIRIA 582 entitled *Source control using constructed pervious surfaces.*

7.4.2 Pervious surfaces act as an effective way to store or infiltrate surface water and have also been shown to act as a filter and retainer for pollutants, in particular oil. This has been investigated and documented within the Quarterly Journal of Engineering Geology and Hydrogeology, Volume 37, November 2004, in which this approach can also be implemented when considering the protection of groundwater. CIRIA have reported that approximately 70-90 percent of hydrocarbons can be removed by this technique.

7.4.3 The Interpave document entitled *Understanding permeable paving: Guidance for designers, planners and local authorities* dated 2010, suggests that permeable paving can permit a flow rate of up to 4000mm/hr. The system shown on Figure 10 allows for the complete capture of water using an impermeable, flexible membrane placed on top of the subgrade level and up the sides of the permeable sub-base.

7.4.4 The maximum gradient of the pavement should not be greater than 1 in 20 unless check dams or terracing is incorporated. A hydraulically bound coarse aggregate base will be required to withstand heavy vehicles. Figure 11 shows the typical dimensions of the permeable paving for this load category.

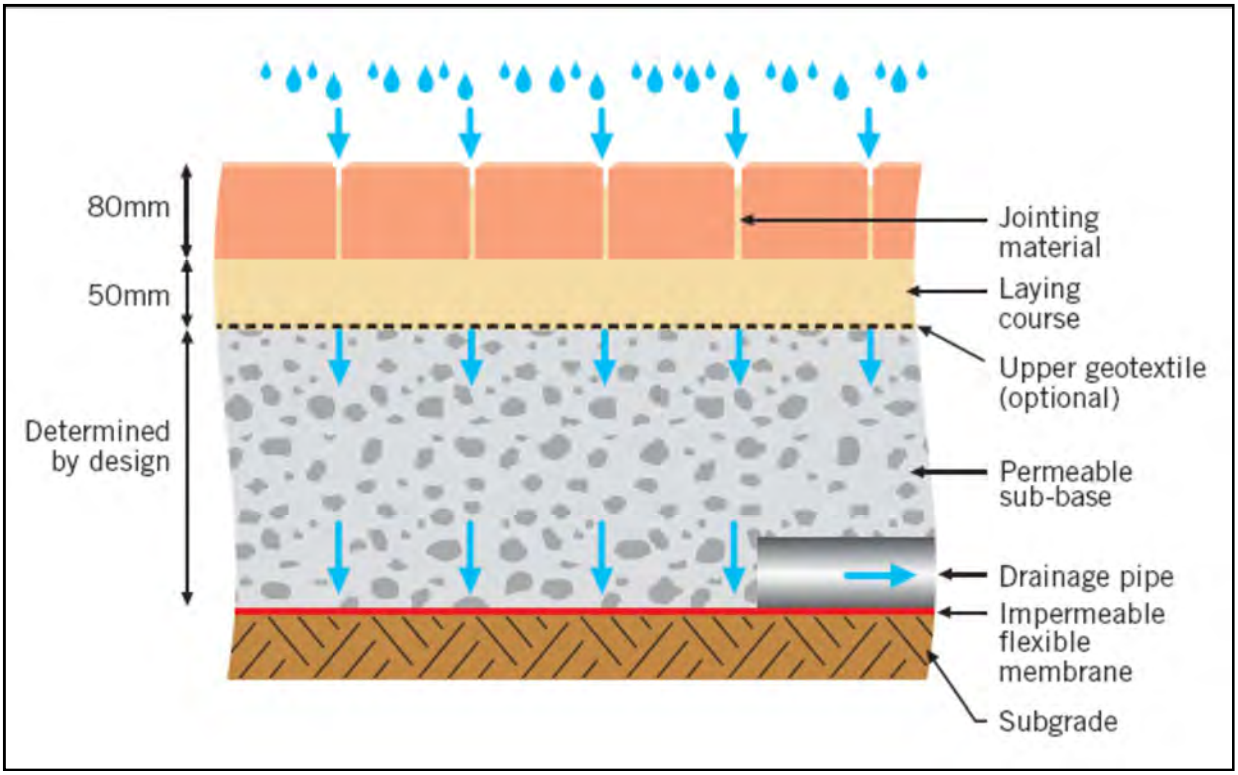


Figure 10: Section through a permeable surface (Source: Interpave *Permeable pavements – guide to the design construction and maintenance of concrete block permeable pavements* dated 2010)

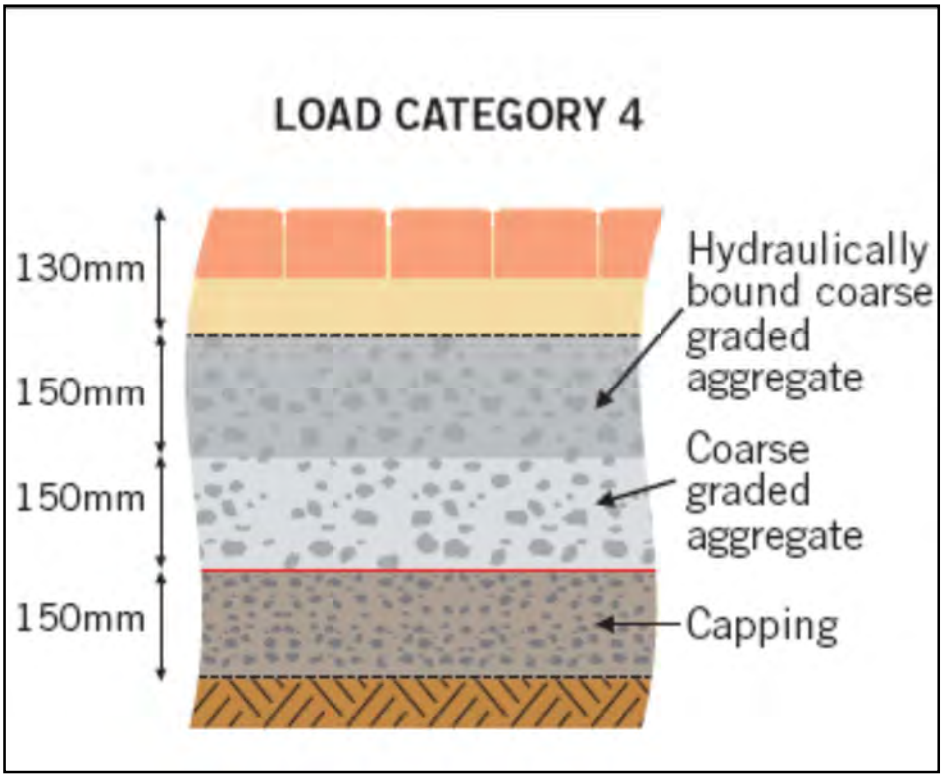


Figure 11: Section through a permeable surface for expected load category (Source: Interpave *Permeable pavements – guide to the design construction and maintenance of concrete block permeable pavements* dated 2010)

7.4.5 The system will be utilising full attenuation and therefore surface water will be temporarily stored within the permeable surface and a 100mm diameter outflow pipe will discharge surface water into the main surface water sewers beneath the proposed access roads.

7.5 Attenuation

7.5.1 All surface water from hardstanding areas of the site (including the adoptable highway, roofs and driveways) would enter the pipe network located beneath the adoptable highway and flow into an attenuation basin or stored within oversized pipes (or into a combination of the two).

7.5.2 Ground levels across the site suggest that an attenuated discharge is feasible into the watercourse located adjacent to the eastern frontage of the site.

7.5.3 It is widely accepted that for a range of annual flow rate probabilities, up to and including the 1 in 100 year event, the developed rate of runoff from a site should be no greater than the existing rate of runoff for the same event. In order to prevent an increase in flow rate within the watercourse system, it is proposed that the discharge from the attenuation feature will be limited to the Greenfield equivalent.

7.5.4 In absence of a site layout, it has been estimated that the contributing hardstanding area will be 2.4 ha (i.e. 50% of the Flood Zone 1 area). The equivalent Greenfield runoff rate has been calculated using the same methodology outlined in Section 7.2 and the results are shown on Figure 12.

		Page 1
	Post-dev greenfield runoff rate equivalent	Micro Drainage
	Designed by Checked by	
Micro Drainage	Source Control 2014.1.1	

ICP SUDS Mean Annual Flood

Input

Return Period (years)	2	Soil	0.300
Area (ha)	2.400	Urban	0.000
SAAR (mm)	713	Region Number	Region 10

Results	l/s
QBAR Rural	4.5
QBAR Urban	4.5
Q2 years	4.2
Q1 year	3.9
Q30 years	7.6
Q100 years	9.3

Figure 12: Greenfield runoff rates for the impermeable area of the proposed site (Source: Microdrainage Version 2014.1.1)

7.5.5 CIRIA 697 and the *Interim Code of Practice for Sustainable Drainage Systems* suggest that it is important to match runoff volumes as well as runoff rates from a development with its Greenfield equivalent. Without employing a wide range of infiltration systems, there will be an increased runoff volume from the site which could increase the volume of floodwater within a receiving watercourse system. Therefore, as recommended by Box 3.1 of CIRIA 697 and page 49 of the *Interim Code of Practice for Sustainable Drainage Systems*, it is preferable to limit the discharge from the attenuation feature during all return period events up to the 1 in 100 year event to the QBAR value.

7.5.6 By reviewing the Greenfield runoff results for the hardstanding areas of the site as shown on Figure 12, the corresponding Greenfield runoff rate for QBAR is 4.5 l/s (i.e. 6.8 l/s lower than the pre-development runoff rate for the whole site). Therefore, the maximum allowable discharge rate from the site equates to 4.5 l/s.

7.5.7 However, it may be difficult to attenuate to such a low discharge rate of 4.5 l/s as the DEFRA/EA technical document entitled *Preliminary rainfall runoff management for developments*, Revision E, dated 2013 states that generally a minimum of 5 l/s from a vortex flow control (e.g. hydrobrake) is a satisfactory compromise between attenuating to a low flow rate while keeping the risk of blockage to an acceptable level. The minimum size of orifice for controlling flow from an attenuation device should normally be 150mm as this also reduces sedimentation.

7.5.8 In order to quantify the approximate volume of surface water needed to be stored within an attenuation feature up to the climate change enhanced 1 in 100 year storm event, the *Source Control – Quick Storage Estimate* function within the Microdrainage software, Version 2014.1.1, has been used together with the DDF rainfall characteristics from the FEH CD-ROM Version 3. The results can be seen on Figure 13 and are summarised in Table 1.

Table 1: Storage calculations

Return Period plus climate change	Discharge rate (l/s)	Storage volume (cu m)
1 in 100	5	1725-2466

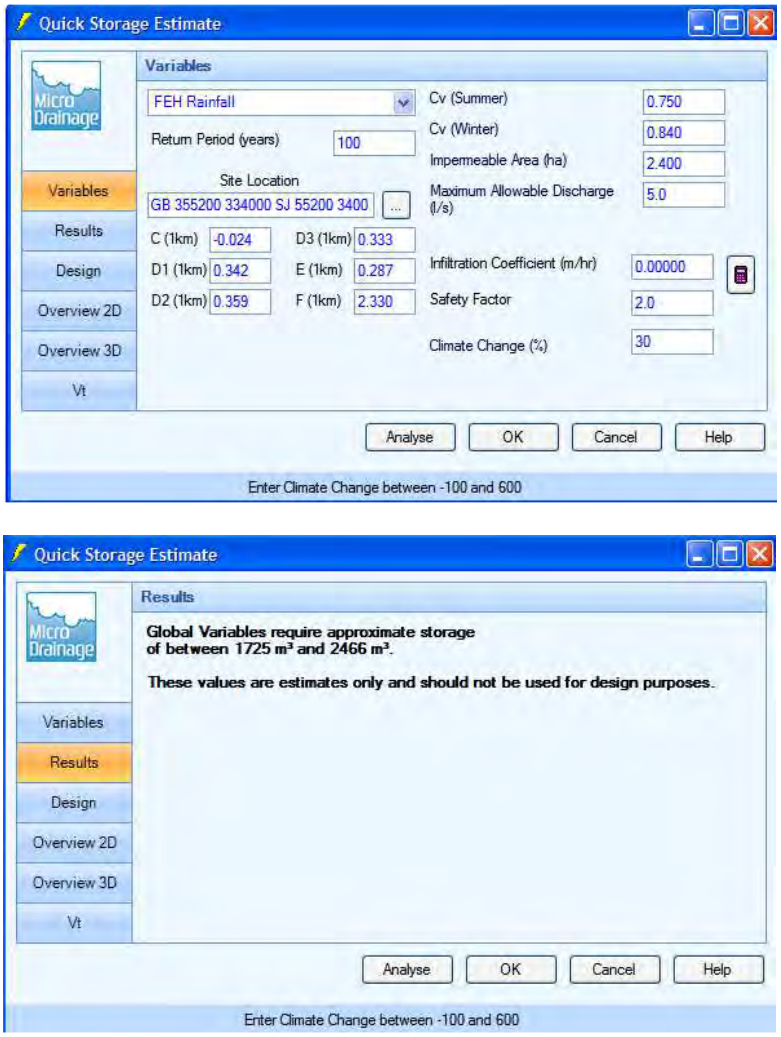


Figure 13: Storage volume during 100 year plus climate change event

7.5.9 Rather than a single attenuation feature, it may be more practical to manage surface water runoff by storing it within a chain of dry detention areas which would also form part of the public open spaces. Surface water could then be attenuated and gradually discharged between detention areas and therefore the final storage point in the management chain would be smaller and could comprise either a small detention area or oversized pipes which would then discharge the runoff from the site at Greenfield runoff rate into the watercourse.

7.5.10 Dry detention basins are discussed further in CIRIA 697 and are effective when providing temporary storage and controlled release of detained runoff. Such features are normally vegetated and are mainly dry except during and immediately after storm events. It is considered that the above options are developed further during the detailed design stage.

7.6 Adoption

7.6.1 CIRIA 687 entitled *Planning for SUDS – Making it Happen*, published in 2010, states that the Flood and Water Management Act 2010 aims to encourage Local Authorities to be responsible for the approval and eventual adoption of SUDS. Therefore, the attenuation features could be adopted by the Local Authority as part of the Community Infrastructure Levy (Planning Act 2008).

7.6.2 Furthermore, the on-site pipe system could be adopted by the appropriate sewerage company and the permeable paving could be privately adopted and maintained.

8. CONCLUSIONS

8.1 A review of the data provided by the Agency and topographical survey has determined that:

a) The site is located within the Flood Zones 1, 2 and 3, however, it is understood that built development will be located across the Flood Zone 1 where all uses of land are appropriate according to NPPF. Water-compatible uses such as open space could be provided across the Flood Zones 2 and 3.

b) Despite built development being located within the Flood Zone 1, as a precaution a warning and evacuation strategy has been developed within this assessment. It is proposed that the occupants register with the Agency's Flood Warnings Direct and prepare a Family Flood Plan. It is recommended that the occupants take advice from the emergency services.

c) Safe access/egress can be achieved during the peak of the event and two access points have been appraised. If access from Mill Street is preferred over access from Lighteach Road (which is located within Flood Zone 1), then local ground raising across the southern part of the site will be required. As this ground raising will occur within the Flood Zones 3 and 2, flood compensation will be required in order to offset the impacts of flood displacement.

d) It is considered that there is a moderate risk of groundwater flooding at the site from underlying deposits and mitigation measures to protect property have been recommended in this report. There is a very low surface water flooding risk at the site and from artificial sources.

Sumner Consultancy Ltd
February 2017

Sumner Consultancy Ltd
Civil Engineering &
Transportation Consultant

ACCESS ASSESSMENT

FOR A PROPOSED DEVELOPMENT
OFF
MILL STREET & LIGHTEACH ROAD PREES

FOR

MR JERRY THORPE

REPORT VERIFICATION

SITE ADDRESS	Mill Street & Lighteach Road Prees
REPORT TITLE	Access Assessment
JOB NUMBER	161-17
PREPARED BY	JRS

ISSUE NO.	DATE	STATUS	REPORT VERSION	ISSUED BY
1	28-02-17	Final for Planning	01	JRS

INDEX

APPENDICES

1. BRIEF

1.1. Sumner Consultancy has been appointed by Mr Jerry Thorpe to carry out an Access Assessment for a proposed housing development site off Mill Street and Lighteach Road Prees, in support of and outline planning application for residential development.

2. SITE INFORMATION

2.1. The site is situated approximately 250m from the centre of Prees on the western side of Whitchurch Road/Shrewsbury Street.

2.2. The site is roughly triangular in shape with an approximate area of 6.5ha. The Site Location Plan is in Appendix 1.

2.3. The site is located at Grid Reference SJ 55122 33756 with a post code of SY13 2ET

2.4. The existing use of the site is agricultural.

2.5. The proposed development will possibly comprise up to 60 dwellings.

3. HIGHWAY ACCESS

3.1. The site can be accessed at two locations, the first is off Mill Street opposite to the junction to Braded Road at the southern side of the site and the second is from the north western corner of the site onto Lighteach Road. Photographs 1 & 2 in Appendix 2.

3.2. Both access locations are subject to a 30mph speed limit.

3.3. The width of Mill Street varies from 7.3m just to the east of the proposed access to 5.3m at the location of the proposed access.

3.4. There is no verge on the northern side of Mill Street, and where the road narrows at the proposed access location the front face of the hedge extends to the northern channel of the road.

3.5. From the junction with Station Road Lighteach Road varies in width from 6.2m to 4.0m along its length up to the last property on the eastern side called Leasholme. Beyond Leasholme the road width reduces to approximately 2.9m, Photograph 3 in Appendix 2.

3.6. Although the width of the road at the proposed access location along Lighteach Road is only 2.9m wide, the highway verge along the site road frontage is over 1.0m wide, therefore it would be possible to utilise the verge to increase the road width to 4.0m to match the width adjoining Leasholme.

3.7. Shropshire's Design Guide recommends junctions on opposite sides of the road should be at least 40m apart.

3.8. The optimum location for the access onto Mill Street is opposite the junction to Brades Road, which would therefore form a cross roads which is not usually considered appropriate by a Highway Authority. Therefore an option would be to form a mini roundabout which could also act as a traffic calming feature along Mill Street.

3.9. The Department for Transport's Design of Mini Roundabouts TD 54/07 states that the visibility required for an 85th Percentile speed of 30mph is 35m, and for 25mph a splay of 25m.

3.10. Visibility splays from three of the arms appear to be less than 35m altough the preliminary mini roundabout design is based on an Ordnance Survey plan and not a topographical survey. With a more accurate design based on a topographical survey, it is possible that the appropriate visibility splays could be achieved.

3.11. It is however considered that with the construction on the mini roundabout the 85th Percentile vehicle speeds could reduce to 25mph, which would reduce the required visibility splays to 25.0m.

3.12. Drawing No. 161-17-05 Access Proposals in Appendix 3 shows the locations for the two accesses and the possible configuration of a mini roundabout along Mill Street.

3.13. An access Road in Shropshire's Design Guide with a carriageway width of 4.8m can accommodate a development of up to 50 dwellings.

3.14. The Environment Agency flood map shows that the existing watercourse to the east of the proposed access off Mill Street is liable to flooding, consequently part of the new access will be in Flood Zone 3 and will therefore need to be raised above this level to prevent the access from flooding and to provide a dry access for pedestrians from the site. A copy of the Environment Agency Flood Map is in Appendix 4.

3.15. As a result of raising the access road it will be necessary to provide a flood compensation area within the site.

3.16. The access off Lighteach Road is within Flood Zone 1 and therefore not affected by any flooding.

4. VISIBILITY SPLAYS

4.1. Measurements for visibility splays are generally taken from a point where the centreline of the minor road meets the channel of the major road, Point A. This is normally at the 'give way' line (or an imaginary 'give way' line if no such markings are provided). The distance back along the minor arm to Point B, from which visibility is measured is known as the X distance. This distance is normally measured along the centreline of the minor arm for simplicity, but in some circumstances (for example where there is a wide splitter island on the minor arm) it will be more appropriate to measure it from the actual position of the driver.

4.2. The Y distance represents the distance that a driver who is about to exit from the minor arm can see to their left and right along the main alignment. For simplicity it is measured along the nearside kerb line of the main arm to Point C, although vehicles will normally be travelling a distance from the kerb line. Therefore a more accurate assessment of visibility splays is made by measuring to the nearside edge of the vehicle track. The measurement is taken from the point where this line intersects the centreline of the minor arm, Point A, (unless, as above, there is a splitter island in the minor arm).

4.3. Currently there are two standards for determining visibility splays, which are defined in Manual for Streets (MfS), and TD42/95 – Geometric Design of Major/Minor Priority Junctions.

4.4. MfS focuses on lightly trafficked residential streets, but many of its key principles may be applicable to other types of street, for example high streets and lightly-trafficked lanes in rural areas. Generally this is limited to locations with traffic speeds less than 40mph. MfS does not apply to the Trunk Road Network.

4.5. TD42/95 is generally applicable to trunk roads where traffic speeds are 40mph and above.

4.6. The visibility standards outlined in MfS is therefore applicable to this site, where the X distance will be from 2.4m and the Y distance for a 30mph speed limit is 43.0m.

4.7. Visibility splays measured on site for the access onto Mill Street from 2.4m were 90m to the east and 88m to the west. Photographs 4 & 5 in Appendix 2.

4.8. Although Lighteach Road is subject to a 30mph speed limit, the speed of vehicles approaching from the west/north westerly direction will be less than 30mph due to the width and alignment of the road, and it is considered that the 85th Percentile speeds would be 25mph, and therefore the visibility splay would be 33.0m

4.9. Visibility splays measured on site for the access onto Lighteach Road from 2.4m were 70m to the southeast and 40m to the northwest. Photographs 6 & 7 in Appendix 2

5. CONCLUSION

5.1. The site can be accessed at two locations, the first is off Mill Street opposite to the junction to Braded Road at the southern side of the site and the second is from the north western corner of the site onto Lighteach Road.

5.2. An access off Mill Street could either be in the form of a simple junction or due to the junction to Brades Road being opposite, a mini roundabout.

5.3. The construction of a mini roundabout would also act as a traffic calming measure along the road which would be of benefit to the adjoining children's play area.

5.4. A simple junction can be constructed off Lighteach Road, and there is scope to widen the existing road from 2.9m to 4.0m.

5.5. Visibility splays onto Mill Street for a simple junction are in excess of 43.0m which is commensurate with a speed of 30mph.

5.6. Visibility splays for the mini roundabout are commensurate with an 85th Percentile speed of 25mph.

5.7. Visibility splays onto Lighteach Road are commensurate with an 85th Percentile speed of 25mph.

5.8. The construction of an access road from Mill Street will require the road to be raised so it is above Flood Zone 3. As a result of this it will be necessary to provide a flood compensation area within the site.

5.9. The access off Lighteach Road is within Flood Zone 1 and therefore not affected by any flooding.

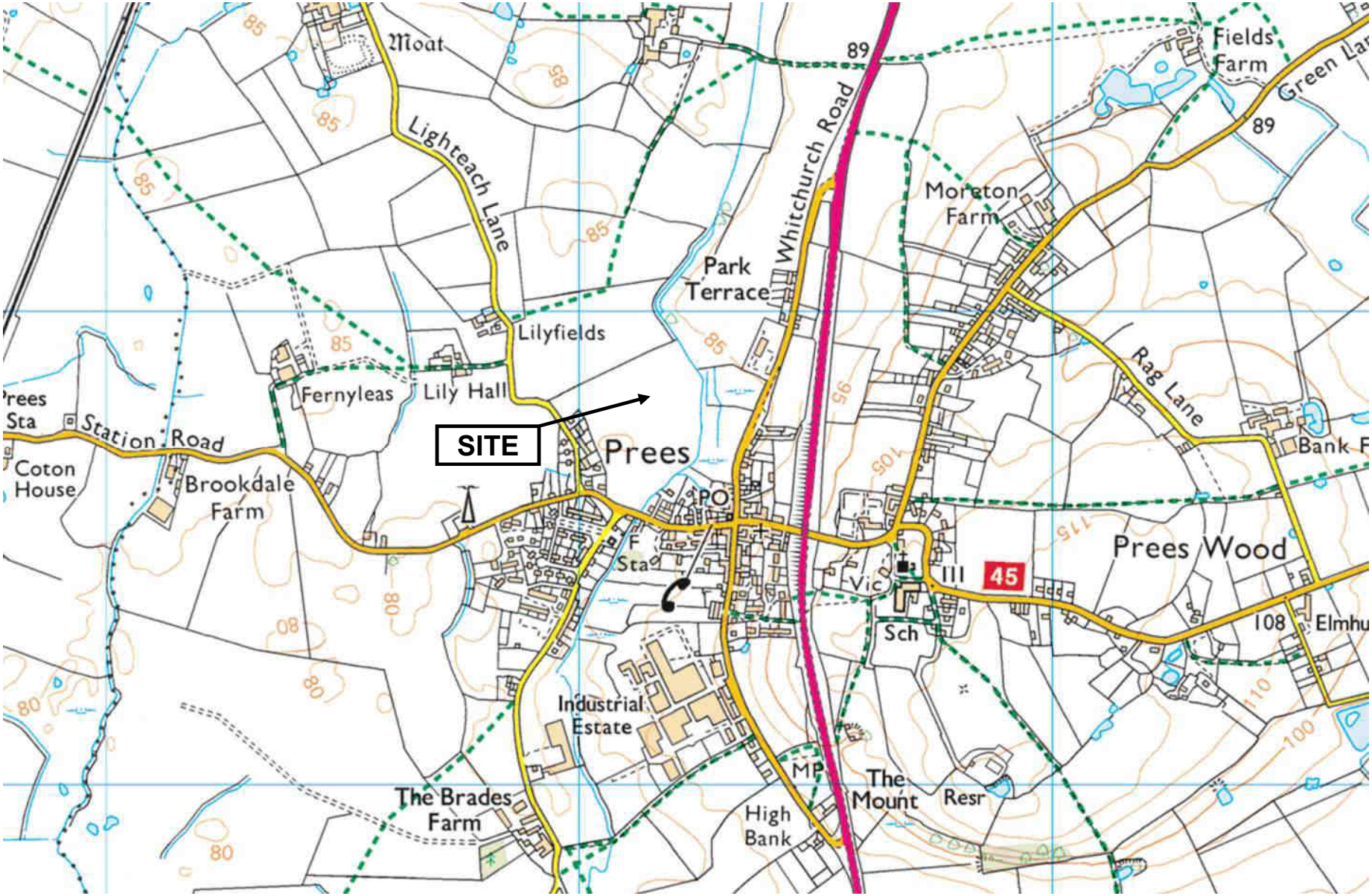
John Sumner IEng MICE
Director
Sumner Consultancy Ltd
February 2017

APPENDIX 1

SITE LOCATION PLAN

SITE LOCATION PLAN

Nearest Post Code SY13 2ET
Grid Reference SJ 55122 33756



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APPENDIX 2

PHOTOGRAPHS

PHOTOGRAPH 1
Proposed access location off Mill Street

PHOTOGRAPH 2
Proposed access location off Lighteach Road

PHOTOGRAPH 3
Lighteach Road adjoining Leasholme looking in a north westerly direction

PHOTOGRAPH 4
Visibility from the northern channel of Mill Street in a south easterly direction

PHOTOGRAPH 5
Visibility from the northern channel of Mill Street in a north westerly direction

PHOTOGRAPH 6
Visibility from the north eastern channel of Lighteach Road in a south easterly direction

PHOTOGRAPH 7
Visibility from the north eastern channel of Lighteach Road in a north westerly direction

APPENDIX 3

DRAWING NO. 161-17-05
ACCESS PROPOSALS

MINI ROUNDABOUT CONFIGURATION

Notes

1. Do not scale from this drawing.
2. All drawings are to be checked by the contractor and setting out engineer and read in conjunction with one another to ensure they are mutually compatible with each other before any setting out or construction commences.
   In the event of apparent ambiguity or contradiction the engineer and/or architect shall be notified immediately. Sumner Consultancy accepts no liability in the event of not being so notified and where construction work has commenced.

Revisions

Rev	Date	Description

Sumner Consultancy Ltd
CIHT Engineering & Transportation Consultant
The Old School
Astley
Shrewsbury
SY4 4BP
Tel: 01939 210 706
Email: info@sumnerconsultancy.co.uk
Web: www.sumnerconsultancy.co.uk

Client: Mr JERRY THORPE

Project: MILL STREET & LIGHTEACH ROAD PREES

Drawing Title: ACCESS PROPOSALS

Scale: 1:500 | Drawn by: JRS | Date: February 2017

Drawing Number: 161-17-05 | Revision:

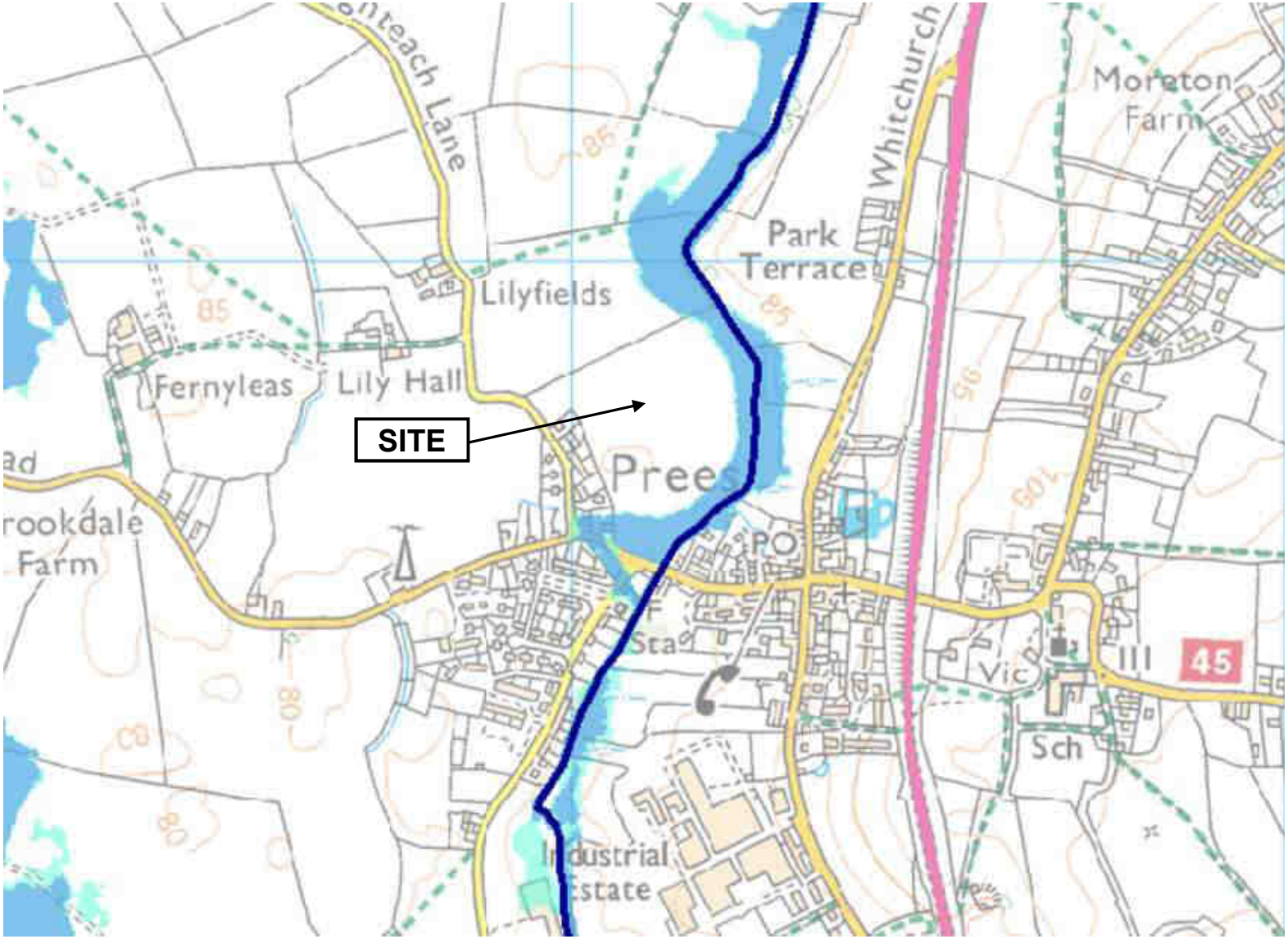
Drawing Size: A1

APPENDIX 4

ENVIRONMENT AGENCY FLOOD MAP

ENVIRONMENT AGENCY FLOOD RISK MAP

Nearest Post Code SY13 2ET
Grid Reference SJ 55122 33756



Flood Zone 3 — Main River Line

Flood Zone 2

Sumner Consultancy Ltd
info@sumnerconsultancy.co.uk www.sumnerconsultancy.co.uk

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$ %$ &$ '$ ($)$

SCALE BAR

SITE AREA = 66,170 m2 (16.35 Acres)

PHASE 2 SHOWN HATCHED
DEVELOPMENT TIMEFRAME YEARS 5-10
(Layout shown indicative)

8No. 2 Bed Semis AFFORDABLE HOUSING.
8No. 3 Bed Semis.
10No. 3 Bed Detached.
4 No. Bungalows.
4 No. 4/5 Bed Detached.

PHASE 1 SHOWN COLOURED
DEVELOPMENT TIMEFRAME YEARS 1-5
(Layout shown indicative)

8No. 2 Bed Semis AFFORDABLE HOUSING.
8No. 3 Bed Semis.
10No. 3 Bed Detached.
4 No. Bungalows.
4 No. 4/5 Bed Detached.

NOTE : SITE LAYOUT INDICATIVE ONLY

IMPORTANT GENERAL NOTES:

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IF IN DOUBT ASK !!

Revision

Rev		Date	By	App
A	GENERAL AMENDMENTS	16.11.20	ED	IB

DGA ARCHITECTURE INTERIOR DESIGN

DGA Architects Ltd . The Studio . 125 Belle Vue Road
Shrewsbury . Shropshire . SY3 7NJ
01743 272265 . design@dgaltd.co.uk . www.dgaltd.co.uk

Client
THE PLANNING GROUP LTD

Project
POTENTIAL DEVELOPMENT
LAND. PREES, SHROPSHIRE.
SY13 2DR

Drawing
INDICATIVE SITE LAYOUT

Drawing status
PLANNING ENQUIRY

Scale	Drawn by	Date
1:1500@A3 1:750@A1	ED	NOV 18

Project number	Drawing number	Revision
18.040	1.00	A

Shropshire Council,
Planning Policy & Strategy Team,
Shirehall,
Abbey Foregate,
Shrewsbury,
Shropshire, SY2 6ND

17th September 2020

Our Ref 102-378

Dear Sirs

Re PPW021a

Please find attached a detailed submission prepared by our client Mr Jerry Thorpe, the owner of the land identified as PPW021a within the SLAA documentation.

This submission is basically divided into two sections, firstly the justification for site PPW021a to be given further consideration and secondly the failure to understand why site PPW025 has been promoted as a suitable site, in preference to PPW021a.

It is not intended to repeat the contents of our client's submission nor the detailed information supplied during the course of the relevant consultation which you will have available on file.

Indeed, the detailed information supplied relating to the potential of the development appears to have received limited consideration. Detailed plans and reports showed clearly that there would be work necessary in flood zones 2 and 3 in order to provide a suitable access road and junction improvements.

As a result of such work, opportunity would arise to alleviate existing flood problems, including the provision of balancing ponds within the site.

At no time has there been any intention to construct residential units within the flood zones and the relevant works will ensure that all residents would be able to assess their homes both by vehicle and on foot at all times.

Furthermore, development of our client's site would provide for extensive public

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Company Reg No 7025025

open space for the use of all village residents and the provision of a small shop to serve both proposed and existing residents in the surrounding area.

The site would also enable a greater number of units, including affordable houses and bungalows, to be provided over the plan period than site PPW025.

Reference is made in highway comments to the proposal amounting to potentially 198 homes, which is unsubstantiated, the submitted indicative layout plan shows a maximum of 60 dwellings, final numbers are open to detailed discussion and to include possible phasing of the development over the plan period as appropriate.

With regard to the documentation relating to the Community Hub of Prees, a number of criteria are set out for all sites and the following Council conclusions reached regards to overall sustainability resulted: -

Site Ref: PPW021a – Overall score - 1 Conclusion Good
Site Ref: PPW025 - Overall score – 5 Conclusion Fair

Both sites were identified as being within either partly or wholly land within Flood Zone 2 or 3.

Historically site PPW021a has no record of previous consultations within the LPA prior to the current SLAA considerations, but strong objections have been raised previously to the development on PPW025 which are included in the documentation submitted by our client and are available in Council records.

In Site Assessment – Stage 3 for PPW021a it states: -

Percentage of site in Flood Zone 3 – 23%
Percentage of site in Flood Zone 2 – 25%
Percentage of site in Flood Zone 1 – 75%

Resulting in an overall percentage of 123% how can this be explained.

Furthermore, the percentage of the site in the 100-year surface flood risk area is only 1% rising to 7% in the 1000-year calculation.

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The above figures throw considerable doubt on the figures contained within the strategic considerations which quote much of the site 25% and 23% as being within Flood Zones 2 and 3.

None of the site subject to flooding will be intended for the siting of residential units and their associated gardens and the access road will be above the flood level.

The access road will be above the flood zone level with only recreational and open space safeguarded for nature conservation would remain in such flood areas.

A conclusion has been reached that the site access is severely restrained by the flood zone with minimal/nil account having been taken of the proposed improvements to enable such safe access as set out in the documentation provided throughout the SLAA process.

It is completely refuted that the development of this site would result in backland development.

The site would be fully served by a new access road and junction onto a road frontage i.e. Mill Street and such an arrangement reflects various new developments in all forms of locations throughout Shropshire and the potential benefit of developing this site as a whole have not been given due consideration.

Site PPW21a scored higher in the sustainability assessment than PPW025 and PPW021a is closer to the main recreational area, playing fields and children's playground than the PPW025 whilst the distance from the proposed site entrance on Mill Street to the main shopping area would not be dissimilar to that from PPW025.

Reference is made to Site PPW021a being contaminated but our client is unclear as to what contamination is understood to exist and where such information has been obtained from, please clarify.

The development of site PPW021a would bring long term benefits to the village in relation to addressing flooding issues, the inclusion of Public Open Space taking advantage of the existence of the brook and proposed balancing ponds, the provision of a new retail unit, new access junction and associated improvements to Mill Street , together with the provision of affordable housing and bungalows on a site immediately adjacent to the main village.

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To conclude, Site PPW021a offers considerably more benefits to local residents than PPW025 and due regard has not been given to the information submitted seeking its inclusion as a preferred site, as opposed to PPW025 which offers no benefits, other than the dwellings themselves to the village of Prees.

Despite numerous requests for meetings throughout the SLAA process to discuss the merits of the site with officers no response has been received despite assurances from officers at all levels including senior management who have merely suggested contacting officers who have failed to respond previously.

Planning Manager

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NOTE : SITE LAYOUT INDICATIVE ONLY

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SCALE BAR

SITE AREA = 66,170 m2 (16.35 Acres)

PHASE 2 SHOWN HATCHED
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Scale	Drawn by	Date
1:1500@A3 1:750@A1	ED	NOV 18

Project number	Drawing number	Revision
18.040	1.00	A

Contents

Criteria	Criteria Description	Scoring Guide	Site Ref: PPW002	Site Ref: PPW004	Site Ref: PPW005	Site Ref: PPW006	Site Ref: PPW007	Site Ref: PPW008	Site Ref: PPW009	Site Ref: PPW010	Site Ref: PPW011	Site Ref: PPW013	Site Ref: PPW014	Site Ref: PPW015
	Site wholly or partly within one or more of the following (record all that apply):													
1	*Special Area of Conservation*	*Yes = double minus score (--) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	Ramsar Site		0	0	0	0	0	0	0	0	0	0	0	0
	National Nature Reserve		0	0	0	0	0	0	0	0	0	0	0	0
	Site of Special Scientific Interest		0	0	0	0	0	0	0	0	0	0	0	0
	Ancient Woodland		0	0	0	0	0	0	0	0	0	0	0	0
	Wildlife Site		0	0	0	0	0	0	0	0	0	0	0	0
	Local Nature Reserve		0	0	0	0	0	0	0	0	0	0	0	0
	Site boundary within buffer zone[1] of one or more (record all that apply):													
2	*1km of a Special Area of Conservation*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	1km of a Ramsar Site		0	0	0	0	0	0	0	0	0	0	0	0
	500m of a National Nature Reserve		0	0	0	0	0	0	0	0	0	0	0	0
	500m of a Site of Special Scientific Interest		0	0	0	0	0	0	0	0	0	0	0	0
	500m of Ancient woodland		0	0	0	0	0	0	0	0	0	0	0	0
	250m of a Wildlife Site		0	0	0	0	0	0	0	0	0	0	0	0
	100m of a Local Nature Reserve		0	0	0	0	0	0	0	0	0	0	0	0
3	*Tree Preservation Order (single or group) within or on site boundary*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	Site contains one or more (or part) of the following[2] (record all that apply):													
4	*Children's playground*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	Outdoor sports facility		0	0	0	0	0	0	0	0	0	0	0	0
	Amenity green space		0	0	0	0	0	0	0	0	0	0	0	0
	Accessible natural green space (natural/semi-natural green space)		0	0	0	0	0	0	0	0	0	0	0	0
	Site boundary within 480m[3] of one or more of the following (record all that apply):													
5	*Primary School*	*Yes = plus score (+) No = minus score (-)*	-	+	+	-	+	-	+	-	-	+	-	+
	GP surgery		+	+	-	-	+	-	+	-	-	+	+	-
	Library(permanent or mobile library stop)		-	-	-	-	-	-	-	-	-	-	-	-
	Leisure centre		-	-	-	-	-	-	-	-	-	-	-	-
	Children's playground		+	+	-	+	-	-	+	-	-	-	-	-
	Outdoor sports facility		+	+	+	+	+	-	+	-	-	+	-	+
	Amenity green space		-	-	-	-	-	-	-	-	-	-	-	-
	Accessible natural green space (natural/semi-natural green space)		-	-	-	-	-	-	-	-	-	-	-	-
6	*Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)*	*Yes = minus score (-) No = zero score (0)*	-	-	-	0	0	-	0	-	-	-	-	-
7	*All or part of the site within a Source Protection Zone (groundwater)*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
8	*All or part of the site is within Flood Zones 2 or 3*	*Yes = minus score (-) No = zero score (0)*	0	0	0	-	0	0	0	0	0	0	0	0
9	*Site wholly/partly within an Air Quality Management Area*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
10	*Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use*	*Yes = plus score (+) No = zero score (0)*	0	0	0	+	0	0	+	0	+	0	0	0
11	*Site would displace an existing waste management operation*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	Site wholly/partly within/contains any of the following (record all that apply):													
12	*a World Heritage Site or its buffer zone*	*Yes = double minus score (--) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	a Scheduled Monument		0	0	0	0	0	0	0	0	0	0	0	0
	a Registered Battlefield		0	0	0	0	0	0	0	0	0	0	0	0
	a Registered Park or Garden		0	0	0	0	0	0	0	0	0	0	0	0
	a Conservation Area		0	0	0	0	0	0	0	0	0	0	0	0
	a Listed Building		0	0	0	0	0	0	0	0	0	0	0	0
	Site boundary within buffer zone[5] of one or more (record all that apply):													
13	*300m of a World Heritage Site or its buffer zone*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0	0	0
	300m of a Scheduled Monument		0	0	0	0	0	0	0	0	0	0	0	0
	300m of a Registered Battlefield		0	0	0	0	0	0	0	0	0	0	0	0
	300m of a Registered Park or Garden		0	0	0	0	0	0	0	0	0	0	0	0
	300m of a Conservation Area		0	-	-	0	-	0	-	0	0	-	0	0
	100m of a Listed Building		0	-	-	-	-	-	-	-	-	-	0	-
14	*Site is wholly/partly classified as very high landscape sensitivity for* ***residential***	*Double minus score (--)*							not assessed					
	Site is wholly/partly classified as high landscape sensitivity for ***residential***	*Minus score (-)*							not assessed					
	Site is wholly/partly classified as medium low, medium, or medium high landscape sensitivity for ***residential***	*Zero score (0)*	0	0	0	0	0	0	not assessed	0	0	0	0	0
	Site is wholly classified as low ***landscape sensitivity*** *for* ***residential*** *or site is inside the development boundary*	*Plus score (+)*							not assessed					
	Please note: where a site falls into more than one category, highest sensitivity category is recorded													
		Overall score	-3	-3	-7	-5	-4	-10	-1	-10	-9	-5	-7	-6
	Range is -1 to -10 Good is -1 to -4 Fair is -5 to -7 Poor is -8 to -10	**Overall Sustainability Conclusion**	**Good**	**Good**	**Fair**	**Fair**	**Good**	**Poor**	**Good**	**Poor**	**Poor**	**Fair**	**Fair**	**Fair**

Criteria	Criteria Description	Scoring Guide	Site Ref: PPW017	Site Ref: PPW018	Site Ref: PPW019	Site Ref: PPW020	Site Ref: PPW022	Site Ref: PPW023	Site Ref: PPW024	Site Ref: PPW025	Site Ref: PPW026	Site Ref: PPW027
1	***Site wholly or partly within one or more of the following (record all that apply):***											
	Special Area of Conservation	*Yes = double minus score (--) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
	Ramsar Site		0	0	0	0	0	0	0	0	0	0
	National Nature Reserve		0	0	0	0	0	0	0	0	0	0
	Site of Special Scientific Interest		0	0	0	0	0	0	0	0	0	0
	Ancient Woodland		0	0	0	0	0	0	0	0	0	0
	Wildlife Site		0	0	0	0	0	0	0	0	0	0
	Local Nature Reserve		0	0	0	0	0	0	0	0	0	0
2	***Site boundary within buffer zone[1] of one or more (record all that apply):***											
	1km of a Special Area of Conservation	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
	1km of a Ramsar Site		0	0	0	0	0	0	0	0	0	0
	500m of a National Nature Reserve		0	0	0	0	0	0	0	0	0	0
	500m of a Site of Special Scientific Interest		0	0	0	0	0	0	0	0	0	0
	500m of Ancient woodland		0	0	0	0	0	0	0	0	0	0
	250m of a Wildlife Site		0	0	0	0	0	0	0	0	0	0
	100m of a Local Nature Reserve		0	0	0	0	0	0	0	0	0	0
3	*Tree Preservation Order (single or group) within or on site boundary*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
4	***Site contains one or more (or part) of the following[2] (record all that apply):***											
	Children's playground	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
	Outdoor sports facility		0	0	0	0	0	0	0	0	0	0
	Amenity green space		0	0	0	0	0	0	0	0	0	0
	Accessible natural green space (natural/semi-natural green space)		0	0	0	0	0	0	0	0	0	0
5	***Site boundary within 480m[3] of one or more of the following (record all that apply):***											
	Primary School	*Yes = plus score (+) No = minus score (-)*	-	-	+	-	+	-	+	+	+	-
	GP surgery		+	+	+	+	-	-	+	+	-	-
	Library(permanent or mobile library stop)		-	-	-	-	-	-	-	-	-	-
	Leisure centre		-	-	-	-	-	-	-	-	-	-
	Children's playground		+	+	+	+	-	-	-	+	-	-
	Outdoor sports facility		+	+	+	-	+	-	+	+	+	-
	Amenity green space		-	-	-	-	-	-	-	-	-	-
	Accessible natural green space (natural/semi-natural green space)		-	-	-	-	-	-	-	-	-	-
6	*Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)*	*Yes = minus score (-) No = zero score (0)*	-	-	-	-	-	-	-	-	-	-
7	*All or part of the site within a Source Protection Zone (groundwater)*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
8	*All or part of the site is within Flood Zones 2 or 3*	*Yes = minus score (-) No = zero score (0)*	-	-	0	-	0	0	0	-	0	0
9	*Site wholly/partly within an Air Quality Management Area*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
10	*Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use*	*Yes = plus score (+) No = zero score (0)*	0	0	+	0	0	0	0	0	0	0
11	*Site would displace an existing waste management operation*	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
12	***Site wholly/partly within/contains any of the following (record all that apply):***											
	a World Heritage Site or its buffer zone	*Yes = double minus score (--) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
	a Scheduled Monument		0	0	0	0	0	0	0	0	0	0
	a Registered Battlefield		0	0	0	0	0	0	0	0	0	0
	a Registered Park or Garden		0	0	0	0	0	0	0	0	0	0
	a Conservation Area		0	0	0	0	0	0	0	0	0	0
	a Listed Building		0	0	0	0	0	0	0	0	0	0
13	***Site boundary within buffer zone[5] of one or more (record all that apply):***											
	300m of a World Heritage Site or its buffer zone	*Yes = minus score (-) No = zero score (0)*	0	0	0	0	0	0	0	0	0	0
	300m of a Scheduled Monument		0	0	0	0	0	0	0	0	0	0
	300m of a Registered Battlefield		0	0	0	0	0	0	0	0	0	0
	300m of a Registered Park or Garden		0	0	0	0	0	0	0	0	0	0
	300m of a Conservation Area		0	-	-	-	-	0	-	-	-	0
	100m of a Listed Building		-	-	-	-	-	0	-	-	-	0
14	*Site is wholly/partly classified as very high landscape sensitivity for* ***residential***	*Double minus score (--)*										not assessed
	Site is wholly/partly classified as high landscape sensitivity for ***residential***	*Minus score (-)*										not assessed
	Site is wholly/partly classified as medium low, medium, or medium high landscape sensitivity for ***residential***	*Zero score (0)*	0	0	0	0	0	0	0	0	0	not assessed
	Site is wholly classified as low ***landscape sensitivity*** *for* ***residential*** *or site is inside the development boundary*	*Plus score (+)*										not assessed
	Please note: where a site falls into more than one category, highest sensitivity category is recorded											
		Overall score	-5	-6	-2	-8	-7	-9	-5	-4	-7	-9
	Range is -1 to -10 Good is -1 to -4 Fair is -5 to -7 Poor is -8 to -10	**Overall Sustainability Conclusion**	**Fair**	**Fair**	**Good**	**Poor**	**Fair**	**Poor**	**Fair**	**Good**	**Fair**	**Poor**

Site Assessments: Whitchurch Place Plan Area

Published November 2018

Site Assessment - Stage 3

Site Reference:	**PPW021a**
Coal Authority Reference Area?	FALSE
Mineral Safeguarding Area?	FALSE
Percentage of site in Flood Zone 3:	23%
Percentage of site in Flood Zone 2:	25%
Percentage of site in Flood Zone 1:	75%
Percentage of the site in the 30 year surface flood risk zone:	0%
Percentage of the site in the 100 year surface flood risk zone:	1%
Percentage of the site in the 1,000 year surface flood risk zone:	7%
Percentage of the site identified on the EA Historic Flood Map:	0%
Percentage of the site within 20m of an historic flood event:	0%
Percentage of the site within 20m of a detailed river network:	0%
All or part of the site within a Source Protection Zone:	No
Landscape Considerations: (from the LVSS)	Medium-Low
Visual Impact Considerations: (from the LVSS)	Medium-Low

Highway Comments - Direct Access to Highway Network?	Y
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Station Road / Mill Street
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	Y
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Assumes development will fund a suitable estate road access to serve potentially 198 homes - ideally a roundabout junction at Station Road / Mill Street / Brades Road and a footway along the site frontage and pedestrian crossing facility to the south side of Mill Street..
Highway Comments - Could the Development Occur Without Off-Site Works?	Y
Highway Comments - Are Envisaged Off-Site Works Achievable?	
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	

Ecology Comments Significant Constraints:	HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA. May trigger Natural England's SSSI IRZ. Retention of the Env. Network corridor reduces the developable area available.
Ecology Comments Other Constraints:	The eastern part of the site lies within an Env. Network corridor due to the presence of a watercourse. This should be retained and appropriately buffered, reducing the developable area available. Requires Ecla and surveys for bats, GCNs (ponds within 500m), badgers, reptiles and nesting birds.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12..
Ecology Comments Opportunities:	
Heritage Comments Significant Constraints:	
Heritage Comments Other Constraints:	E side and S end of site include the site of a former mill pond and mill race (HER PRN 15656) for Prees Mill. Large size of site suggests it may otherwise have archaeological potential.
Heritage Comments Management of Constraints:	Heritage Assessment required with application (archaeological DBA + field evaluation).
Heritage Comments Opportunities:	
Tree Comments Significant Constraints:	
Tree Comments Other Constraints:	Large field site with curtilage hedges stream to west would need buffer zone
Tree Comments Management of Constraints:	Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.
Tree Comments Opportunities:	Use 20% canopy cover policy to increase woodland cover and integrate the development into the broader landscape
Public Protection Comments Significant Constraints:	
Public Protection Comments Other Constraints:	Possible contaminated land.
Public Protection Comments Management of Constraints:	Remediation likely to be available.
Public Protection Comments Opportunities:	

Sustainability Appraisal Conclusion:	Not assessed

Strategic Considerations:	The site consists of a large agricultural field located to the north of Prees. The sites northern, eastern and southern boundaries are defined by agricultural field boundaries. Much of the site (25% and 23%) is in flood zone 2 and 3 HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses The eastern part of the site lies within an Env. Network corridor due to the presence of a watercourse. Heritage Assessment required with application Possible contaminated land.
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.

Potential for Windfall?	No
Potential for Allocation?	No
Recommendation	**Remain as countryside**
Reasoning	Site access is severely constrained by the flood zone. Development would result in backland development. The only other access is an unsuitable single carriageway to the NW. There are therefore other more suitable sites for allocation
If proposed for Allocation, Potential Capacity:	
If proposed for Allocation Design Requirements:	

Site Assessment - Stage 3

Site Reference:	**PPW021b**
Coal Authority Reference Area?	FALSE
Mineral Safeguarding Area?	FALSE
Percentage of site in Flood Zone 3:	0%
Percentage of site in Flood Zone 2:	0%
Percentage of site in Flood Zone 1:	100%
Percentage of the site in the 30 year surface flood risk zone:	0%
Percentage of the site in the 100 year surface flood risk zone:	0%
Percentage of the site in the 1,000 year surface flood risk zone:	0%
Percentage of the site identified on the EA Historic Flood Map:	0%
Percentage of the site within 20m of an historic flood event:	0%
Percentage of the site within 20m of a detailed river network:	0%
All or part of the site within a Source Protection Zone:	No
Landscape Considerations: (from the LVSS)	Medium-Low
Visual Impact Considerations: (from the LVSS)	Medium-Low

Highway Comments - Direct Access to Highway Network?	Y
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Lighteach Road
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	Y
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Assumes the development funds an appropriate estate road access for potentially 198 homes, a review and extension of the existing speed limit and widening of Lighteach Road and footway along the site frontage.
Highway Comments - Could the Development Occur Without Off-Site Works?	N
Highway Comments - Are Envisaged Off-Site Works Achievable?	N. The development could potentially deliver missing sections of footway on Lighteach Road within the built up area but not immediately south of the site where road widening would also be needed. These improvements would be necessary given the scale of the development. The pedestrian route into the village is also lacking a section of footway along Station Road from Lighteach Road to Brades Road.
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	

Ecology Comments Significant Constraints:	HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA. May trigger Natural England's SSSI IRZ.
Ecology Comments Other Constraints:	Requires Ecla and surveys for bats, GCNs (ponds within 500m), badgers and nesting birds. Hedgerows and trees should be retained and buffered.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.
Ecology Comments Opportunities:	
Heritage Comments Significant Constraints:	
Heritage Comments Other Constraints:	No known archaeological interest but medium size of site suggests it may have some potential.
Heritage Comments Management of Constraints:	Heritage Assessment required with application (archaeological DBA + ?field evaluation).
Heritage Comments Opportunities:	
Tree Comments Significant Constraints:	
Tree Comments Other Constraints:	Large field site with curtilage hedges stream to west would need buffer zone
Tree Comments Management of Constraints:	Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.
Tree Comments Opportunities:	Use 20% canopy cover policy to increase woodland cover and integrate the development into the broader landscape
Public Protection Comments Significant Constraints:	
Public Protection Comments Other Constraints:	Possible contaminated land.
Public Protection Comments Management of Constraints:	Remediation likely to be available.
Public Protection Comments Opportunities:	

Sustainability Appraisal Conclusion:	#N/A

Strategic Considerations:	The site consists of the elements of a large agricultural field located outside of flood risk zones 2 and/or 3, to the north of Prees. HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses Heritage Assessment required with application Possible contaminated land.
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.

Potential for Windfall?	No
Potential for Allocation?	No
Recommendation	**Remain as countryside**
Reasoning	Site access is severely constrained by the flood zone. Development would result in backland development. The only other access is an unsuitable single carriageway to the NW. There are therefore other more suitable sites for allocation
If proposed for Allocation, Potential Capacity:	
If proposed for Allocation Design Requirements:	

Site Assessment - Stage 3

Site Reference:	**PPW022**
Coal Authority Reference Area?	FALSE
Mineral Safeguarding Area?	FALSE
Percentage of site in Flood Zone 3:	0%
Percentage of site in Flood Zone 2:	0%
Percentage of site in Flood Zone 1:	100%
Percentage of the site in the 30 year surface flood risk zone:	0%
Percentage of the site in the 100 year surface flood risk zone:	0%
Percentage of the site in the 1,000 year surface flood risk zone:	0%
Percentage of the site identified on the EA Historic Flood Map:	0%
Percentage of the site within 20m of an historic flood event:	0%
Percentage of the site within 20m of a detailed river network:	0%
All or part of the site within a Source Protection Zone:	No
Landscape Considerations: (from the LVSS)	Medium-High
Visual Impact Considerations: (from the LVSS)	Medium-High

Highway Comments - Direct Access to Highway Network?	Y
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Lacon Street
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	Y
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Assumes development will fund a suitable estate road access to serve potentially 91 homes and a footway along the site frontage
Highway Comments - Could the Development Occur Without Off-Site Works?	Y
Highway Comments - Are Envisaged Off-Site Works Achievable?	Assumes the development will fund a footway on the north side of Lacon Street into the village to link to the existing network.
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	

Ecology Comments Significant Constraints:	HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA. May trigger Natural England's SSSI IRZ.
Ecology Comments Other Constraints:	Requires Ecla and surveys for bats, GCNs (ponds within 500m), badgers, reptiles and nesting birds. Hedgerows and trees should be retained and buffered.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.
Ecology Comments Opportunities:	
Heritage Comments Significant Constraints:	
Heritage Comments Other Constraints:	Potential impacts on settings of Grade II* St Chad's Church (NHLE ref. 1213100) Grade II listed buildings of Manor House (NHLE ref. 1056018), Wood Bank (NHLE ref. 1056021) and Barn c. 20m E of Wood Bank (NHLE ref. 1213543). Site adjacent to historic core of village and may therefore have archaeological potential.
Heritage Comments Management of Constraints:	Heritage Assessment required with application (impact on settings of LBs and CA ; archaeological DBA + field evaluation).
Heritage Comments Opportunities:	
Tree Comments Significant Constraints:	
Tree Comments Other Constraints:	Hedges and one or two scattered trees
Tree Comments Management of Constraints:	Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.
Tree Comments Opportunities:	Use 20% canopy cover policy to increase woodland cover and integrate the development into the broader landscape
Public Protection Comments Significant Constraints:	
Public Protection Comments Other Constraints:	Road to the south creating noise.
Public Protection Comments Management of Constraints:	Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment.
Public Protection Comments Opportunities:	

Sustainability Appraisal Conclusion:	Fair

Strategic Considerations:	Site comprises a square field in agricultural use to the north of Lacon Street. The sites southern boundary is defined by Lacon street. Its western boundary is defined by residential curtilages and is also the development boundary. HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses May trigger Natural England's SSSI IRZ. Heritage Assessment required with application Road to the south creating noise
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.

Potential for Windfall?	No
Potential for Allocation?	No
Recommendation	**Remain as countryside**
Reasoning	There are other more suitable sites for allocation
If proposed for Allocation, Potential Capacity:	
If proposed for Allocation Design Requirements:	

Site Assessment - Stage 3

Site Reference:	**PPW024**
Coal Authority Reference Area?	FALSE
Mineral Safeguarding Area?	FALSE
Percentage of site in Flood Zone 3:	0%
Percentage of site in Flood Zone 2:	0%
Percentage of site in Flood Zone 1:	100%
Percentage of the site in the 30 year surface flood risk zone:	0%
Percentage of the site in the 100 year surface flood risk zone:	0%
Percentage of the site in the 1,000 year surface flood risk zone:	0%
Percentage of the site identified on the EA Historic Flood Map:	0%
Percentage of the site within 20m of an historic flood event:	0%
Percentage of the site within 20m of a detailed river network:	0%
All or part of the site within a Source Protection Zone:	No
Landscape Considerations: (from the LVSS)	Medium-Low
Visual Impact Considerations: (from the LVSS)	Medium-Low

Highway Comments - Direct Access to Highway Network?	Y
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Shrewsbury Street
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	Y
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Assumes development will fund a suitable estate road access to serve potentially 28 homes and a review and extension of the existing speed limit and any necessary traffic calming. Ideally a planned shared access with PPW019.
Highway Comments - Could the Development Occur Without Off-Site Works?	Y
Highway Comments - Are Envisaged Off-Site Works Achievable?	
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	

Ecology Comments Significant Constraints:	HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA. May trigger Natural England's SSSI IRZ.
Ecology Comments Other Constraints:	The eastern boundary is adjacent to an Env. Network corridor. PROWs cross the site. Requires Ecla and surveys for bats, GCNs (ponds within 250m/500m), badgers, reptiles and nesting birds. Hedgerows and trees should be retained and buffered.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.
Ecology Comments Opportunities:	
Heritage Comments Significant Constraints:	N/A
Heritage Comments Other Constraints:	N/A
Heritage Comments Management of Constraints:	
Heritage Comments Opportunities:	
Tree Comments Significant Constraints:	
Tree Comments Other Constraints:	Hedges and one mature tree
Tree Comments Management of Constraints:	Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.
Tree Comments Opportunities:	Use 20% canopy cover policy to increase woodland cover and integrate the development into the broader landscape
Public Protection Comments Significant Constraints:	
Public Protection Comments Other Constraints:	Road to east and west.
Public Protection Comments Management of Constraints:	Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment.
Public Protection Comments Opportunities:	

Sustainability Appraisal Conclusion:	Fair

Strategic Considerations:	The site is in agricultural use and is sandwiched between the A49 and Shrewsbury Street, south of Prees and is far from the development boundary. HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses May trigger Natural England's SSSI IRZ The eastern boundary is adjacent to an Env. Network corridor Road noise to E and W
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.

Potential for Windfall?	No
Potential for Allocation?	No
Recommendation	**Remain as countryside**
Reasoning	Site is divorced from the existing built form of the village, and is therefore too far from the services. There are other more suitable sites for allocation
If proposed for Allocation, Potential Capacity:	
If proposed for Allocation Design Requirements:	

Site Assessment - Stage 3

Site Reference:	**PPW025**
Coal Authority Reference Area?	FALSE
Mineral Safeguarding Area?	FALSE
Percentage of site in Flood Zone 3:	3%
Percentage of site in Flood Zone 2:	7%
Percentage of site in Flood Zone 1:	93%
Percentage of the site in the 30 year surface flood risk zone:	0%
Percentage of the site in the 100 year surface flood risk zone:	0%
Percentage of the site in the 1,000 year surface flood risk zone:	1%
Percentage of the site identified on the EA Historic Flood Map:	0%
Percentage of the site within 20m of an historic flood event:	0%
Percentage of the site within 20m of a detailed river network:	0%
All or part of the site within a Source Protection Zone:	No
Landscape Considerations: (from the LVSS)	Medium-Low
Visual Impact Considerations: (from the LVSS)	Medium-Low

Highway Comments - Direct Access to Highway Network?	Y
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Whitchurch Road
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	Y
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Assumes development will fund a suitable estate road access to serve potentially 52 homes and a review of the existing speed limit and any necessary traffic calming. Ideally a planned shared access with PPW020.
Highway Comments - Could the Development Occur Without Off-Site Works?	Y
Highway Comments - Are Envisaged Off-Site Works Achievable?	
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	

Ecology Comments Significant Constraints:	HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA. May trigger Natural England's SSSI IRZ.
Ecology Comments Other Constraints:	Requires Ecla and surveys for bats, GCNs (ponds within 250m/500m), badgers and nesting birds. Hedgerows and trees should be retained and buffered.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.
Ecology Comments Opportunities:	
Heritage Comments Significant Constraints:	
Heritage Comments Other Constraints:	Potential impacts on settings of Grade II listed 14-16 Whitchurch Road (NHLE ref. 1236426), Tudor House (NHLE ref. 1236340) and Barn c. 20m N of Tudor House (NHLE ref. 1264627), and 9 Whitchurch Road (NHLE ref. 1222022). Site immediately adjacent to boundary of, and within setting, of Prees Conservation Area. No known archaeological interest but medium size of site suggests it may have some potential.
Heritage Comments Management of Constraints:	Heritage Assessment required with application (impact on settings of LBs and CA ; archaeological DBA + ?field evaluation).
Heritage Comments Opportunities:	
Tree Comments Significant Constraints:	
Tree Comments Other Constraints:	Hedges and one or two scattered trees only on large field site adjacent to wooded area to the SW
Tree Comments Management of Constraints:	Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.
Tree Comments Opportunities:	Use 20% canopy cover policy to increase woodland cover and integrate the development into the broader landscape
Public Protection Comments Significant Constraints:	
Public Protection Comments Other Constraints:	Road noise to the east.
Public Protection Comments Management of Constraints:	Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment.
Public Protection Comments Opportunities:	

Sustainability Appraisal Conclusion:	Good

Strategic Considerations:	Site is a mostly rectangular field in agricultural use off Whitchurch Road, north of Prees. HRA will be required for recreational impacts in-combination on Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. May trigger Natural England's SSSI IRZ. Heritage Assessment required with application
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.

Potential for Windfall?	No
Potential for Allocation?	Yes
Recommendation	**Allocate**
Reasoning	The site has few constraints and is suitably located close to the heart of the village. The recently developed medical practice to the north provides further containment. Development can take place whilst mitigating any flood risk to the east. The site can also provide a reasonable proportion of the guideline of dwellings for Prees.
If proposed for Allocation, Potential Capacity:	35 dwellings
If proposed for Allocation Design Requirements:	The site will be served from a vehicular access from Whitchurch Road. The site is to include a mix of dwelling types to reflect local housing needs, including bungalows. Open space and play facilities will be provided on site. The site is outside the local flood risk area.

Regulation 18
Pre-Submission Draft
Shropshire Local Plan
2016 to 2038

Sustainability Appraisal and Site Assessment

Environmental Report

July 2020

Whitchurch Sites SA: Summary	
WHT031	Fair
WHT032	Fair
WHT033	Fair
WHT034	Good
WHT035	Fair
WHT036	Poor
WHT037	Fair
WHT037VAR	Fair
WHT038a	Poor
WHT038b	Poor
WHT038c	Poor
WHT039	Poor
WHT040	Fair
WHT040a	Good
WHT040b	Good
WHT040c	Good
WHT041	Poor
WHT042	**Fair**
WHT043	Poor
WHT044	Fair
WHT045	Good
WHT046	Fair
WHT047	Fair
WHT048	Poor
WHT049	Fair
WHT050	Poor
WHT051	Good
WHT052	Fair
WHT053	Poor
WHT054	Fair
WHT056	Fair
WHT037 & WHT044	Fair

Prees Sites SA: Summary	
PPW001X	Poor
PPW002	Good
PPW004	Good
PPW005	Fair
PPW006	Fair
PPW007	Fair
PPW008	Poor

Prees Sites SA: Summary	
PPW009	Good
PPW010	Poor
PPW011	Poor
PPW013	Fair
PPW014	Fair
PPW015	Poor
PPW017	Fair
PPW018	Fair
PPW019	Good
PPW020	Poor
PPW001X	Poor
PPW021a	Good
PPW021b	Good
PPW022	Fair
PPW023	Poor
PPW024	Fair
PPW025	**Fair**
PPW026	Poor
PPW027	Poor

Strategic Housing Sites SA Summary	
ALB018	Good
BAY003	Fair
BNT002	**Fair**
BRD011	Fair
BRD030	Fair
BWU001	Fair
HDL017	Good
IRN001	**Poor**
LUD004	Fair
LUD041	Good
MDR042 Amended	Good
MDR046	Fair
MDR049	Fair
MOR012	Good
OSW060	Good
P10	Fair
P16	Fair
P17a	Fair
P17b	Fair
P26	Poor